COB - BOSAIR FORM

07/21/2026 12:02 PM (MST)
Submitted by Terri.Tillman2@pima.gov (Terri.Tillman@pima.gov)

BOARD OF SUPERVISORS AGENDA ITEM REPORT (BOSAIR)

All fields are required. Enter N/A if not applicable. For number fields, enter 0 if not applicable.

Award Type:	Agenda Item
BOSAIR Activity:	Board Meeting Request
Requested Board Meeting Date:	08/11/2026
Project Title / Description:	P26CU00002 PADILLA - W. DIAMOND BELL RANCH ROAD WIRELESS COMMUNICATION TOWER (APPEAL)

JUL 27'26 PM 03:04 PCO/CLERK OF BD

Agenda Item Report

Introduction / Background:	Ryan and Lindsay Chastain, appeal the decision of the Hearing Administrator in case P26CU00002 to allow a Type 1 Conditional Use Permit for a new wireless communications facility located at 15949 W. Diamond Bell Ranch Road in the CB-1 (Local Business) zone. Section 18.07.030.H of the Pima County Zoning Code allows wireless towers as a Type 1 Conditional Use in the CB-1 zone. The Hearing Administrator granted APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS.
Discussion:	An appeal of the Hearing Administrators' Decision to Grant Approval for a Type I Conditional Use Permit to construct a wireless communication facility.
Conclusion:	If the Appeal is upheld, the applicant will not be able to construct a wireless communication facility, and the Conditional Use Permit will not be issued.
Recommendation:	The Board of Supervisors will determine the validity of the appeal at public hearing.
Fiscal Impact:	N/A
Support of Prosperity Initiative:	9. Expand Broadband Services and Address Barriers to Digital Inclusion
Provide information that explains how this activity supports the selected Prosperity Initiative	If the Board of Supervisors deny the Appeal, the conditional use permit will expand broadband services and will provide improved access to modern wireless communication networks.
Board of Supervisor District:	• 3
Department:	Development Services - Planning
Name:	Spencer Hickman

Telephone: (520) 724-6498

Department Director Signature: Thomas Drzazgowski Date: 7/21/2026 | 4:00 PM MST

Deputy County Administrator Signature: Date: 7/27/2026 | 2:26 PM MST

County Administrator Signature: Date: 7/27/2026 | 2:50 PM MST

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

PIMA COUNTY
DEVELOPMENT SERVICES

TO: Honorable Jennifer Allen, District 3

FROM: Tom Drzazgowski, Deputy Director Tom Drzazgowski
Public Works-Development Services Department-Planning Division

DATE: July 21, 2026

SUBJECT: **P26CU00002 PADILLA – W. DIAMOND BELL RANCH ROAD WIRELESS COMMUNICATION TOWER (APPEAL)**

The above referenced Appeal of the Hearing Administrator's Decision is within your district and is scheduled for the Board of Supervisors' **TUESDAY, August 11, 2026** hearing.

REQUEST: Ryan and Lindsay Chastain, **appeal** the decision of the Hearing Administrator in case P26CU00002 to allow a Type 1 Conditional Use Permit for a new wireless communications facility located at **15949 W. Diamond Bell Ranch Road** in the CB-1 (Local Business) zone. Section 18.07.030.H of the Pima County Zoning Code allows wireless towers as a Type 1 Conditional Use in the CB-1 zone. The Hearing Administrator granted APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS.

OWNER: Manuel Padilla
5311 S. Hildreth Avenue
Tucson, AZ 85746

APPELANT: Ryan and Lindsay Chastain
16130 W. Ridgemoor Avenue
Tucson, AZ 85736

DISTRICT: 3

STAFF CONTACT: Spencer Hickman, Planner II

PUBLIC COMMENT TO DATE: On June 2, 2026, staff received one letter appealing the Hearing Administrator's Decision.

MAEVEEN MARIE BEHAN CONSERVATION LANDS SYSTEM (CLS): The property is located within the Maeveen Marie Behan Conservation Land System designated as Multiple Use Management Area.

TD/SH/ds
Attachments

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PIMA COUNTY
DEVELOPMENT SERVICES

BOARD OF SUPERVISORS MEMORANDUM

SUBJECT: P26CU00002

FOR AUGUST 11, 2026 MEETING OF THE BOARD OF SUPERVISORS

TO: HONORABLE BOARD OF SUPERVISORS

FROM: Tom Drzazgowski, Deputy Director Tom Drzazgowski
Public Works-Development Services Department-Planning Division

DATE: July 21, 2026

ADVERTISED ITEM FOR PUBLIC HEARING

APPEAL OF HEARING ADMINISTATOR'S DECISION

P26CU00002 PADILLA – W. DIAMOND BELL RANCH ROAD WIRELESS COMMUNICATION TOWER (APPEAL)

In accordance with Section 18.97.030.F of the Pima County Zoning Code, Ryan and Lindsay Chastain, **appeal** the decision of the Hearing Administrator in case P26CU00002 to allow a Type 1 Conditional Use Permit for a new wireless communications facility located at **15949 W. Diamond Bell Ranch Road** in the CB-1 (Local Business) zone. Section 18.07.030.H of the Pima County Zoning Code allows wireless towers as a Type 1 Conditional Use in the CB-1 zone. The Hearing Administrator granted APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS. (District 3)

On June 2, 2026 staff received an Appeal of the Hearing Administrator's Decision to approve the Type I Conditional Use Permit for a wireless communications facility in case P26CU00002 citing concerns over the 150-foot height of the tower and whether the applicant demonstrated gap coverage, prospective alternative sites and/or co-location opportunities along with the provision of analysis listing the positive and negative conditions of each alternative site along with maps and detailed explanations for why each alternative was rejected. The written appeal was received within the 30-day time frame allowed in the Pima County Zoning Code Section 18.97.030.F.

Below, is the case advertisement and the summary of the May 13, 2026, Conditional Use Public Hearing.

P26CU00002 PADILLA – W. DIAMOND BELL RANCH ROAD

Manuel Padilla, represented by Renee Fontaine with Rocky Mountain Tower, requests a **Type I Conditional Use Permit for a new wireless communications facility** in accordance with Section 18.07.030.H of the Pima County Zoning Code, in the CB-1 (Local Business) zone located on the south side of W. Diamond Bell Ranch Road approximately 750 feet southeast of the T-intersection of W. Larkdale Street and W. Diamond Bell Ranch Road, addressed as **15949 W. Diamond Bell Ranch Road**. (District 3)

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Summary of Hearing Administrator Hearing (May 13, 2026)

In accordance with Pima County Zoning Code Section 18.97.030.F.3, a public hearing was held on this application on May 13, 2026. Both an in-person and online/virtual option were provided. The applicant presented the conditional use permit request and answered the Hearing Administrator's questions. Their RF engineer also made a detailed presentation as to the existing coverage gap that the tower intends to fill. The applicant's submittal package included substantial narrative information and maps in addition to the proposed development plan for the new tower. Photo-simulations of the post-construction condition were also provided.

Three (3) members of the public attended the hearing to speak on the matter, one (1) of which was in-person and the other two (2) attending virtually. All three speakers were in strong opposition to the tower, essentially agreeing that it was not needed for wireless coverage purposes, that it would: 1) be a wholly inappropriate intrusion upon the established rural character and aesthetics of the Diamond Bell Ranch; 2) that many other sites are available in other areas; 3) that it would destroy the pristine viewshed enjoyed by the residents; 4) that it would accordingly reduce property values; and 5) that it would have negative health effects upon the residents. In addition to this testimony at public hearing, more than ten (10) emails were received by staff prior to the hearing, all of which were in strong opposition, and which cited essentially the same objections.

After hearing all of the above and allowing the applicant an opportunity to respond to the public testimony, the Hearing Administrator closed the public hearing, thanked the attendees, and informed all those in attendance that he would issue his decision in writing the following week.

Subsequent to the public hearing, the Hearing Administrator **APPROVED the Type I Conditional Use Permit subject to Standard and Special Conditions:**

1) The height of the new tower shall be no more than one hundred fifty feet (150') to the top of the monopole structure itself, with the additional 4' tall lightning rod atop.
2) The tower installation shall be constructed in substantial conformance with the submitted drawings, including the routing of underground lines and the location of the on-the-ground equipment area.
3) The entire pole, antennae array, and all feeder cabling necessary to serve it shall be painted an anodized aluminum color, as this has been found by prior studies to generally be the least visually intrusive of all potential color treatments.
4) The on-the-ground equipment area shall be enclosed by an eight foot (8') tall masonry wall, <u>not</u> by a chain link fence. The wall and associated doors and access gates shall be painted a desert tan color.
5) A formal Development Plan (DP)/Site Construction Permit (SCP) is required for permitting.
6) Review and approval by the Regional Flood Control District (RFCD) is required at the time of permitting.
7) Any changes to the location of the proposed improvements may require an engineering and hydrologic analysis to be submitted to RFCD review and approval at the time of permitting.
8) Any impact to mapped regulated riparian habitat, that is not approved by RFCD, is prohibited.
9) Per FCC Regulations and federal nexus, Section 106 of the NHPA may apply. A Class III cultural resources/archaeological survey shall be submitted for review at the time of permitting.

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TD/SH/ds
Attachments

C: Ryan and Lindsay Chastain
Manuel Padilla
Renee Fontaine; Rocky Mountain Tower

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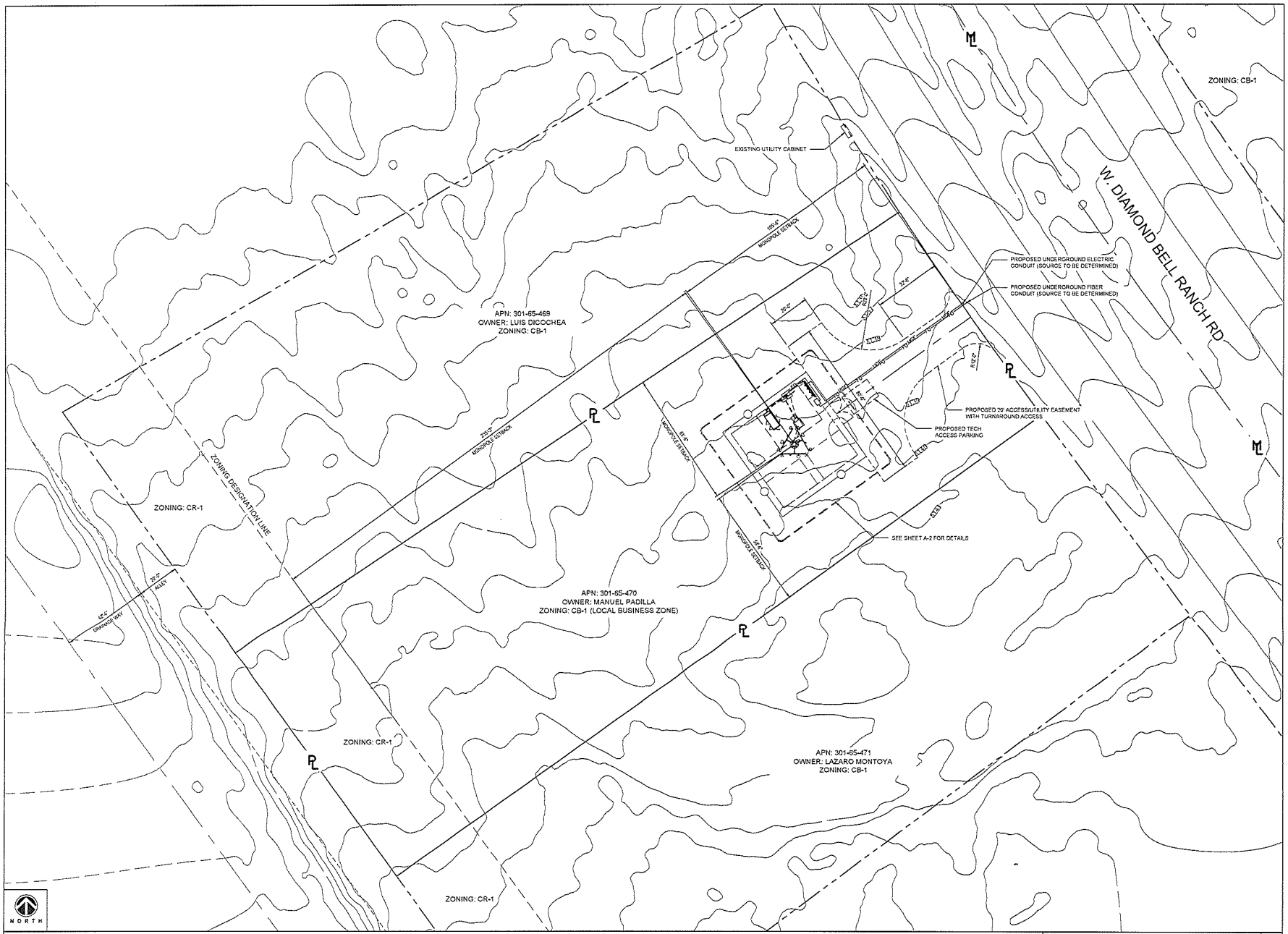

OVERALL SITE PLAN

24"x36" SCALE: 1" = 20'-0"
12"x18" SCALE: 1" = 40'-0"

1

CLIENT:

RMT

PLANS PREPARED BY

State 48 Development Consulting

WWW.STATE48CONSULTING.COM
114 W. MAIN ST #210
MESA, AZ 85201
480-242-2477 602-821-3587

THESE ZONING DRAWINGS ARE PROPRIETARY, COPYWRITTEN AND THE PROPERTY OF ROCKY MOUNTAIN TOWERS AND PRODUCED SOLELY FOR THE USE OF OUR PROJECT DEVELOPMENT. ANY REPRODUCTION, DISTRIBUTION OR USE OF THE INFORMATION CONTAINED WITHIN SAID DRAWINGS IS PROHIBITED WITHOUT WRITTEN CONSENT OF ROCKY MOUNTAIN TOWERS.

PROJECT NUMBER	DRAWN BY	CHK'D BY
PENDING	AJ	DM

REVISIONS

1	02.09.26	ZONING DRAWINGS
1	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

15649 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

OVERALL SITE PLAN

SHEET NUMBER

A-1

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PIMA COUNTY
DEVELOPMENT SERVICES

HEARING ADMINISTRATOR'S FINDINGS AND DECISION

Case No. P26CU00002
PADILLA – W. DIAMOND BELL RANCH ROAD
Type I Conditional Use – Wireless Communications Facility

Authority

Rocky Mountain Towers, representing the property owner Manuel Padilla, and further representing Verizon Wireless, requests a Type I Conditional Use Permit for a new wireless communication facility in accordance with Section 18.07.030.H of the Pima County Zoning Code in the CB-1 (Local Business) zone, located on W. Diamond Bell Ranch Road, just south of its intersections with W. Larkdale Street and W. Fannin Road, and addressed as 15949 W. Diamond Bell Ranch Road. (District 3)

Particulars of the Request

The proposed monopole is one hundred fifty-feet (150') tall to the top of the metal structure, with a 4' tall lightning rod extending above this height. Per the Federal Aviation Administration (FAA), no illumination is necessary atop the tower. This facility will provide a new antennae array for Verizon Wireless, as well as up to three (3) additional/future co-location slots. Given the height of the tower, no camouflage (such as a faux tree) is proposed, other than the painting of the pole and arrays. A 50' x 50' compound, fenced with a slatted chain-link fence and barbed wire top, is proposed to house the on-the-ground support equipment.

Public Hearing

In accordance with Pima County Zoning Code Section 18.97.030.F.3, a public hearing was held on this application on May 13, 2026. Both an in-person and online/virtual option were provided. The applicant presented the conditional use permit request and answered the Hearing Administrator's questions. Their RF engineer also made a detailed presentation as to the existing coverage gap that the tower intends to fill. The applicant's submittal package included substantial narrative information and maps in addition to the proposed development plan for the new tower. Photo-simulations of the post-construction condition were also provided.

Three (3) members of the public attended the hearing to speak on the matter, one (1) of which was in-person and the other two (2) attending virtually. All three speakers were in strong opposition to the tower, essentially agreeing that it was not needed for wireless coverage purposes, that it would: 1) be a wholly inappropriate intrusion upon the established rural character and aesthetics of the Diamond Bell Ranch; 2) that many other sites are available in other areas; 3) that it would destroy the pristine viewshed enjoyed by the residents; 4) that it would accordingly reduce property values; and 5) that it would have negative health effects upon the residents. In addition to this testimony at public hearing, more than ten (10) emails were received by staff prior to the hearing, all of which were in strong opposition and which cited essentially the same objections.

After hearing all of the above and allowing the applicant an opportunity to respond to the public testimony, the Hearing Administrator closed the public hearing, thanked the attendees, and informed all those in attendance that he would issue his decision in writing the following week.

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Hearing Administrator's Comments

The following comments are offered based upon the particulars of this case, together with the public comment received on it, with the intent of making clear the Hearing Administrator's considerations and rationale in rendering his final decision. The following topics are pertinent:

Quality of Applicant's Submittal. The Hearing Administrator finds that this applicant's submitted package is generally very well done and very thorough. What's more, the radio-frequency (RF) study provided establishes that not only does a gap in coverage exist for Verizon Wireless (their initial client), but also for the other major national wireless carriers, with the nearest existing tower being at least five (5) miles distant and most far further than that. The construction of a tower with co-location opportunities for up to three (3) additional carriers is simply intelligent, and further promotes Pima County adopted policy that encourages co-location to minimize the number of towers that will proliferate a given area.

Inappropriateness of a Tower in this Rural Area. The speakers in opposition were unanimous on this point, and it is a position that has been repeatedly heard by this Hearing Administrator in evaluating new towers in rural areas. Those who move to rural areas commonly do so to get away from the undesirable components of urban life. This is understandable, but it is unrealistic to think that somehow the rural environment they enjoy will remain unchanged over time as communication technologies evolve and their rural area grows. The Diamond Bell Ranch project is subdivided for hundreds and hundreds of lots and many more future residents. Such an area clearly demands reliable wireless coverage for both ordinary and emergency purposes. It is further true that wireless providers (such as Verizon) labor under the obligations of their Federal Communications Commission (FCC) license, a primary mandate of which is the methodical filling of gaps in coverage so as to create a robust wireless communications network across this country.

Views. It is common for those who enjoy exceptional views to expect, or even demand, that those views remain unobstructed and protected. Nonetheless, the legal reality of this issue has long been settled by case law. No party who has enjoyed a view across another's private party has any perpetual or prescriptive right inured to them to keep enjoying that same view as long as they desire. A view is a privilege, not a right.

Perceived Reduction in Property Values. The Federal Telecommunications Act prohibits local zoning authorities from considering anecdotal testimony or opinions on reduced property values when rendering their decision to approve or deny a new tower. Professional, empirical studies on this topic, undertaken in the specific vicinity of a proposed tower, may be taken into consideration. No such empirical evidence was presented by any opposing party attendant to this case.

Allegations of Negative Health Effects. The Federal Telecommunications Act prohibits local zoning authorities from considering any testimony about perceived negative health effects when rendering their decision to approve or deny a new tower. While endless information alleging harmful and even deadly effects proliferates the internet, more reliable scientific studies support the opposite conclusion.

Required Standards and Findings

Following are the Hearing Administrator's findings relative to the standards set by Pima County Code Sec. 18.97.030.F.3.c. These Sections stipulate that the following standards be met by the proposed use:

1. **It will not be in serious conflict with the objectives of the general land use plan or the area plan in which situated.**

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The subject property is part of a cluster of lots designated as *Rural Crossroads (RX)* by the Pima County Comprehensive Plan (Pima Prospers), the primary purpose of which is "to designate mixed use areas where basic goods and services are provided to rural settlements and rural residents as conveniently as possible." Smaller *RX* areas are generally located at rural roadway intersections of collector or arterial roadways, for the provision of limited commercial services to rural residents and travelers.

The aforementioned cluster of commercial lots within Diamond Bell Ranch was clearly intended as a business hub to provide for the goods and services needed by future residents. Further, the Pima County Zoning Code strongly encourages co-location facilities so as to minimize the number of towers that proliferate an area. This is especially valuable in more rural situations such this one. Locating a new tower within the designated business hub of Diamond Bell Ranch is appropriate, a truth that will become more apparent as businesses establish within that hub.

With all of the above in mind, the Hearing Administrator finds the proposed tower is not conflict with the Comprehensive Plan and is, in fact, wholly consistent and supportive of the basic purpose of the site's *RX* designation as described above.

2. **It will provide safeguards for the protection of adjacent developed property, or if the adjacent property is undeveloped, for the legal permitted uses of such property.**

The Hearing Administrator finds that the proposed new tower will not have a significant impact upon any of the surrounding properties in a way that prohibits any of their legal or permitted uses.

3. **It has adequate accessibility to the County road network.**

The site has direct access to a Diamond Bell Ranch Road, the main thoroughfare of the community and a designated major street on the County's *Major Streets and Routes Plan.* Access needs for such wireless facilities are minimal at best. With the above in mind, access is found to be adequate.

4. **It has sufficient off-street parking and loading facilities, that will be developed in accordance with County engineering standards.**

Parking sufficiency and compliance with the Zoning Code in this regard is a matter verified at the time of permitting.

5. **It will meet County standards in terms of control of noise, smoke, glare or heat, odors, vibrations, fly, ash, dust, fumes, vapors, gasses, and other forms of air pollution, liquids and solid wastes.**

The Hearing Administrator finds that proposed use is found to not threaten the surrounding properties in any of the above ways, notwithstanding that some of the public testimony heard in this case claims potential harm to the health of adjoining residents. This claim is rejected by the Hearing Administrator.

6. **Hours of operation will not be detrimental to adjoining residents.**

This is an unmanned facility; hours of operation do not apply.

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7. Landscaping will be fully in conformance with zoning code regulations.

Landscaping requirements, if any, are a matter enforced at the time of permitting.

Hearing Administrator's Decision

This application for a Type I conditional use permit for a new communications tower, on property zoned CB-1, is hereby **approved** by the Hearing Administrator, subject to the following *Special Conditions:*

Special Conditions

1) The height of the new tower shall be no more than one hundred fifty feet (150') to the top of the monopole structure itself, with the additional 4' tall lightning rod atop.
2) The tower installation shall be constructed in substantial conformance with the submitted drawings, including the routing of underground lines and the location of the on-the-ground equipment area.
3) The entire pole, antennae array, and all feeder cabling necessary to serve it shall be painted an anodized aluminum color, as this has been found by prior studies to generally be the least visually intrusive of all potential color treatments.
4) The on-the-ground equipment area shall be enclosed by an eight foot (8') tall masonry wall, not by a chain link fence. The wall and associated doors and access gates shall be painted a desert tan color.
5) A formal Development Plan (DP)/Site Construction Permit (SCP) is required for permitting.
6) Review and approval by the Regional Flood Control District (RFCD) is required at the time of permitting.
7) Any changes to the location of the proposed improvements may require an engineering and hydrologic analysis to be submitted to RFCD review and approval at the time of permitting.
8) Any impact to mapped regulated riparian habitat, that is not approved by RFCD, is prohibited.
9) Per FCC Regulations and federal nexus, Section 106 of the NHPA may apply. A Class III cultural resources/archaeological survey shall be submitted for review at the time of permitting.

Protest Period and Appeal Procedures

As is the case with all Type I conditional use permit applications, this decision is subject to a statutory 30-day protest period. If a valid protest is received within the 30-day period from the date of this decision by any property owner within the statutory notice area, an appeal hearing will be scheduled before the Board of Supervisors, who shall then hear the appeal and make the final decision on this conditional use permit.

Any party interested in filing an appeal should contact Mr. Spencer Hickman, Planner II, at phone number 520.724.6498 Please be advised that filing fees apply to any appeal, and that these fees are payable by the party filing the appeal request.

Respectfully Submitted:

May 18, 2026

Jim Portner
Pima County Hearing Administrator

Date

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PIMA COUNTY
DEVELOPMENT SERVICES

MEMORANDUM

PUBLIC HEARING – May 13, 2026

DATE: May 8, 2026

TO: Jim Portner, AICP, Hearing Administrator

FROM: Spencer Hickman, Planner II

SUBJECT: **P26CU00002 PADILLA – W. DIAMOND BELL RANCH ROAD**

Type I Conditional Use Permit
Scheduled for public hearing on May 13, 2026

LOCATION:
The project location is on land in unincorporated Pima County on the south side of W. Diamond Bell Ranch Road approximately 200 feet south of the intersection of W. Fannin Road and W. Diamond Bell Ranch Road, addressed as 15949 W. Diamond Bell Ranch Road. The project area totals approximately 1.14 acres. The subject property is parcel 301-65-4700. The property is zoned CB-1 (Local Business) and CR-1 (Single Residence).

SURROUNDING LAND USE OR CONTEXT:
The majority of the subject property parcel is zoned CB-1, while approximately 12% of the lot (0.134 acres near the southwestern lot line) is zoned CR-1 (note that this may be due to mapping errors within the PimaMaps GIS service; the rezoning ordinance appears to designate the entire parcel as CB-1 zoning). The surrounding properties with access to W. Diamond Bell Ranch Road are zoned CB-1, while the properties to the west (fronting W. Ridgemoor Avenue) are zoned CR-1. Access to the subject property will be used from W. Diamond Bell Ranch Road.

PUBLIC COMMENT:
As of the writing of this report on May 8, 2026, staff has received seven letters of opposition from the public. The primary reason for opposition cited is the disruption to views and natural beauty, and that a structure such as the one proposed would be out of character with the neighborhood which only contains underground utilities.

PREVIOUS CASES ON PROPERTY:
None.

BACKGROUND INFORMATION
The proposed use is for a 150-foot-tall monopole-style communication tower with associated ground equipment. The subject property is approximately 1.14 acres. The property is zoned CB-1 and CR-1 and is currently undeveloped. Some single-family residences have been developed in the residential lots to the west and south. Section 18.07.030.H.2.e.2 of the Pima County Zoning Code permits monopole wireless communication facilities in the CB-1 zone as a permitted use with the approval of a Type I conditional use permit.

The access drive will enter the lot from Diamond Bell Ranch Road and provides vehicle access to the equipment compound. The monopole sits at the center of this compound, and has setbacks of 105.5 feet to the east, 235.25 feet to the west, 58.5 feet to the south, and 65.5 feet

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to the north. The compound is bounded on all four sides by an 8-foot tall slatted chain link fence. As previously stated, the tower is a monopole design reaching up to 150 feet tall (topped with a 4-foot lighting rod) and is not camouflaged.

An RF Analysis prepared by Steven Kennedy (provided in application packet) and sealed by James M. Jones (a registered engineer in the state of Arizona) states a lack of reliable coverage for base user Verizon, as well as potential for service improvement for future users of the tower such as T-Mobile and AT&T, as the proposed tower is designed to accommodate co-location of other carriers in the future. The commercial zoning of the property was listed as a key factor in choosing the subject site, as CC&R's in many of the residential areas would be too restrictive to meet the applicant's requirements. The reports in the application materials did not state if a lower-height tower, or several shorter towers compared to the proposed, would be viable options for filling the gap in cellular coverage.

DEPARTMENT COMMENTS

Regional Flood Control District

The Regional Flood Control District (The District) has reviewed the site conditions and has provided comments that are attached to the end of this report.

The District has no objection to the conditional use permit, subject to the RFCD conditions as seen below.

Cultural Resources

Per FCC Regulations and federal nexus, Section 106 of the NHPA may apply. Please submit a Class III survey for review.

STAFF RECOMMENDATION

Section 18.07.030.H.2.e.2 of the zoning code permits monopole wireless communication facilities in the CB-1 zone as a permitted use with the approval of a Type I conditional use permit. Staff has **NO OBJECTION** to the proposed Type I Conditional Use Permit. While staff has no objection to the request to fill a gap in coverage, the Hearing Administrator should consider if a shorter/multiple shorter towers are a viable alternative to the proposal, as the 150-foot requested height exceeds what is typically approved for towers located in rural-residential neighborhoods. Should the Hearing Administrator approve the request, staff recommends the following conditions as listed below:

Regional Flood Control District Conditions:

1. Regional Flood Control District review and approval are required at the time of permitting.
2. Changes to the location of the proposed improvements may require an engineering analysis to be submitted to the Regional Flood Control District for review and approval at the time of permitting.
3. Avoidance of the riparian habitat is required. Any impact to riparian habitat that is not shown on the approved site plan will be prohibited.

Cultural Resources Condition:

4. Per FCC Regulations and federal nexus, Section 106 of the NHPA may apply. Please submit a Class III survey for review.

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c: Tom Drzazgowski – Chief Zoning Inspector
Manuel Padilla – Owner
Rocky Mountain Towers - Applicant

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PIMA COUNTY
FLOOD CONTROL

MEMORANDUM

DATE: April 27, 2026

TO: Spencer Hickman
Planner II
Planning and Zoning

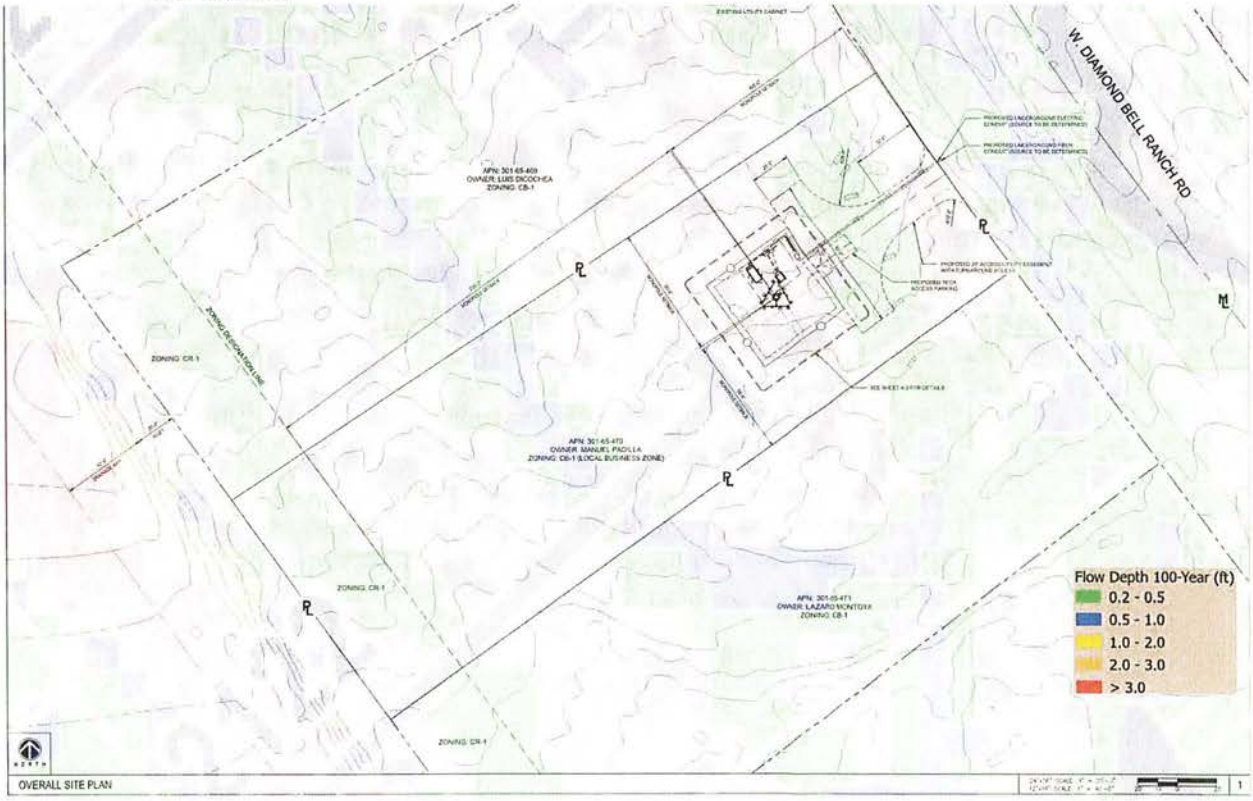
Haley Erickson
FROM: Haley Erickson
Engineer II

SUBJECT: P26CU00002

The District has reviewed the site conditions and offers the following information and comments:

1. The project is not impacted by a federal floodplain. Therefore, the designated Special Flood Hazard Area is Zone X.

2. The project is impacted by a local floodplain as identified in the effective Sierrita Mountains North Study. The Study results are shown below overlain onto the provided site plan. The Study provides an estimated 100-year peak discharge of 2,122 cubic feet per second that partially flows through the property, with flow depths up to 1'.
    a. Based on the Study results, the current proposed improvements are in a location where the development avoids the concentrated flows on the site. Any changes to the location of the proposed improvements could require an engineering analysis to be approved by the District.



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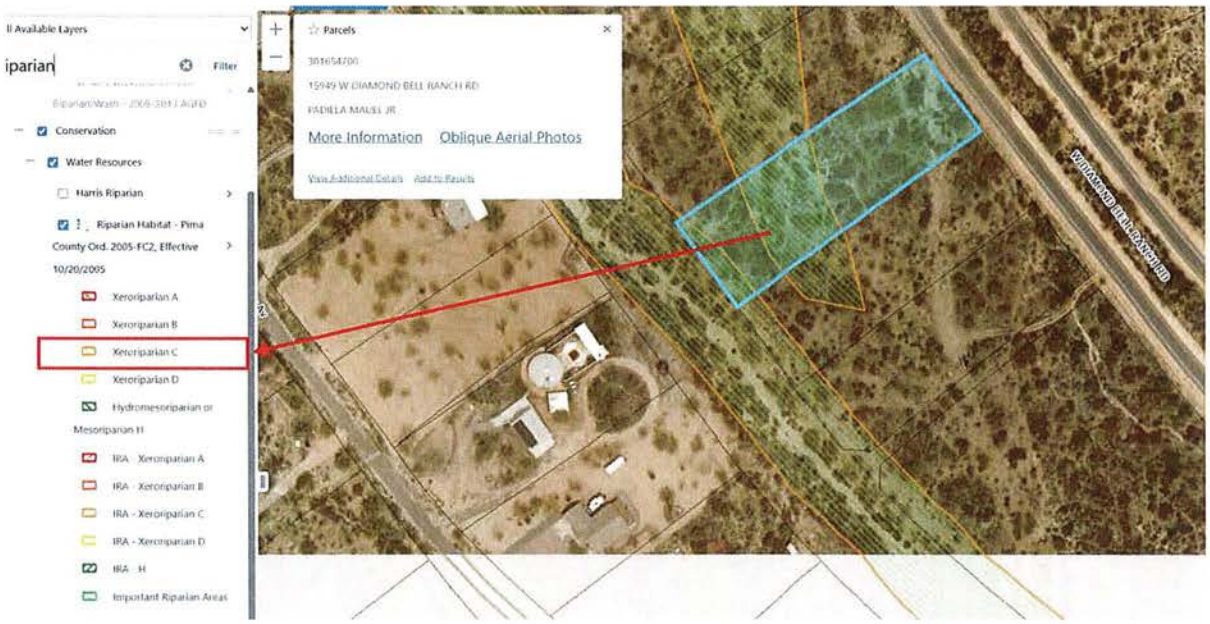
3. There is mapped Regulated Riparian Habitat (RRH) classified as Xeroriparian C, within the subject parcel, shown below. To obtain approval at the time of permitting, the site plan should show the mapped RRH boundary with the correct classification called out.

   The following notes should be provided on the site plan at the time of permitting;
   a. Total amount of regulated riparian habitat onsite: _____ acres
   b. Regulated riparian habitat disturbed prior to the 2005 Riparian Classification Maps: _____acres
   c. No new disturbance is proposed to the regulated riparian habitat.
   d. This project <u>does not require</u> a Riparian Habitat Mitigation Plan.



4. At the time of permitting, a site plan will be required for review and approval. Refer to the following link from the Regional Flood Control District web site for the information that is required to be on the site plan for permitting; [Site Plans | Pima County, AZ]
   a. The information that at minimum should be provided on the site plan:
      i. Regulatory wash lines and floodplain extents,
      ii. Erosion hazard setbacks, where the EHS is measured from, (the EHS is a building set back)
      iii. RRH boundary with classification (including information outlined under item #3 above), and
      iv. Show and label all existing and proposed improvements, to scale and properly dimensioned, including structures, septic systems, fences, walls, shade structures, berms, ditches, driveways, grading, or any other manmade feature that may divert, retard, or obstruct flow.

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

The District **has no objection** to the conditional use permit, subject to the following conditions.

a. Regional Flood Control District review and approval are required at the time of permitting.
b. Changes to the location of the proposed improvements may require an engineering analysis to be submitted to the Regional Flood Control District for review and approval at the time of permitting.
c. Avoidance of the riparian habitat is required. Any impact to riparian habitat that is not shown on the approved site plan, will be prohibited.

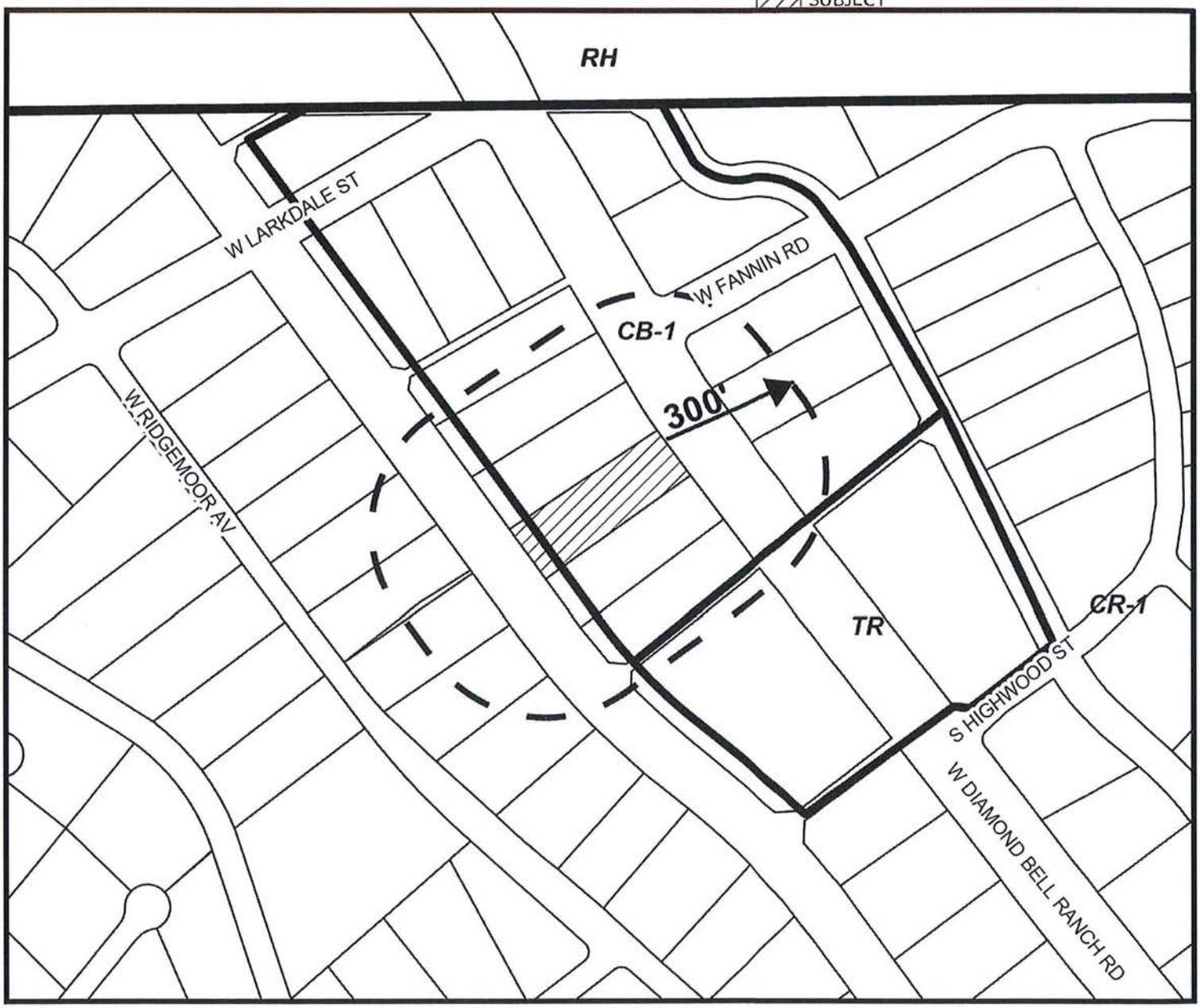
HE/pg

Cc: File

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

PIMA COUNTY DEVELOPMENT SERVICE DEPARTMENT
PLANNING DIVISION
APPEAL OF HEARING ADMINISTRATOR'S DECISION - TYPE 1 CONDITIONAL USE PERMIT

Zoning | 300' NOTIFICATION AREA | SUBJECT



0 145 290 580 Feet

P26CU00002 PADILLA - 15949 W DIAMOND BELL RANCH RD

PIMA COUNTY
DEVELOPMENT SERVICES

Notes: **TAXCODE(S): 301-65-4700**

Map Scale: 1:4,000 | Map Date: 04/14/26 MK

N W E S

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

June 2nd 2026

Case No. P26CU00002 Rocky Mountain Tower

Dear Development Services,

We are writing to formally appeal the decision on the proposed installation of the 150-foot tower located within the 300-foot notice area of my property. Although our home is within the notification zone, we did not receive the initial notification and only recently became aware of this project.

We strongly object to this tower being placed in our backyard, when our home is situated in a strict CR-1 Zone. The proposed lot also has a small fraction of CR-1 zoning. Our review of the Pima County Code suggests that the applicant is required to provide more than just a demonstration of a coverage gap; they must also identify prospective alternative sites and co-location opportunities, provide a pros and cons analysis, and offer maps and detailed explanations for why each alternative was rejected.

To date, we have only found a brief statement claiming that other sites were infeasible. We have not seen a specific analysis identifying the sites considered or the rationale for their rejection.

We are also extremely concerned that our property values could be reduced by as much as 20%. While the initial application decision referred to older case law, there was no documentation provided to support the Hearing Officer's comments as they relate to property values and cell towers. A recent National Association of Realtors study supports this potential for lost value. This is a unique neighborhood with unobstructed breathtaking views, underground utilities, and we cannot afford to jeopardize these attributes for an unnecessary tower.

We believe several subsections of Pima County Zoning Code Section 18.07.030 (Land Use Regulations) Paragraph H (Communication Towers) have not been properly addressed, specifically:

- Sub Paragraph c: "To maintain and preserve the existing unique attributes of community character"
- Sub Paragraph e: "To minimize the adverse impacts of communications towers"
- Sub Paragraph g: "To protect the aesthetic quality of neighborhoods"

We will present the full text of these subsections at the time of the hearing.

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Because the proposed tower is 150 feet tall, it cannot be effectively camouflaged. I hope you will take these points into consideration and grant the appeal.

Sincerely,

Ryan and Lindsay Chastain

16130 W Ridgemoor Ave. Tucson AZ. 85736

307 689-3414

Signature(s) Lindsay Chastain

Ryan Chastain

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

PIMA COUNTY
DEVELOPMENT SERVICES

Conditional Use Permit Application

Property Owner: Manual Padilla Phone: 520-490-1147

Owner's Mailing Address, City, State & Zip: 5311 S. Hildreth Ave.

Applicant (if different from owner): Rocky Mountain Tower Phone: 424-386-5552

Applicant's Mailing Address, City, State & Zip: 5150 Mae Anne Ave, Ste 405 #5349, Reno, NV

Applicant's or Owner's Email Address: rfontaine@siteac-llc.com

Property Address or Tax Code: 15949 W. Diamond Bell Ranch Road, Arivaca, AZ 85736

Type of Use Proposed for the Property: Telecommunication Tower and associated equipment.

Discuss the proposed use and it's compatibility with the surrounding area: See attached narrative.

☒ The applicant agrees to contact the Regional Flood Control District to discuss the proposal prior to application submittal.

☒ The applicant agrees to contact United States Fish and Wildlife Service at scott_richardson@fws.gov and provide a written notice that an application for a conditional use permit has been submitted a minimum of 15 days prior to the public hearing date.

This application is for a (Select one):

☒ Type I Conditional Use ☐ Type II Conditional Use ☐ Type III Conditional Use

Terms and Conditions

☒ I confirm the information provided is true and accurate to the best of my knowledge. I am the owner of the above described property or have been authorized by the owner to make this application. (By checking the box, I am electronically signing this application.)

Date: 3.20.26

SITE#: RMT-113

SITE NAME: DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS: 15949 W. DIAMOND BELL RANCH RD

DESIGN TYPE: 150' MONOPOLE

ARIZONA STATE CODE COMPLIANCE

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

2018 INTERNATIONAL BUILDING CODE
2018 INTERNATIONAL MECHANICAL CODE
2018 INTERNATIONAL FIRE CODE
2017 NATIONAL ELECTRICAL CODE/NFPA-70

ACCESSIBILITY REQUIREMENTS

THIS FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. HANDICAPPED ACCESS REQUIREMENTS ARE NOT REQUIRED IN ACCORDANCE WITH THE CURRENT INTERNATIONAL BUILDING CODE.

ENGINEERS NOTES

1. IF A DISCREPANCY ARISES BETWEEN THE DRAWINGS AND FIELD CONDITIONS, OR WHERE A DETAIL IS DOUBTFUL OF INTERPRETATION, OR AN UNANTICIPATED FIELD CONDITION IS ENCOUNTERED, THE ENGINEER SHALL BE CALLED IMMEDIATELY FOR PROCEDURE TO BE FOLLOWED. SUCH INSTRUCTIONS SHALL BE CONFIRMED IN WRITING AND DISTRIBUTED TO ALL AFFECTED PARTIES.

2. THE ENGINEER WILL NOT BE RESPONSIBLE FOR CONSTRUCTION MEANS, METHODS, TECHNIQUES. SEQUENCES, PROCEDURES, SAFETY PRECAUTIONS, OR PROGRAMS UTILIZED IN CONNECTION WITH THE WORK, AND WILL NOT BE RESPONSIBLE FOR THE CONTRACTOR'S FAILURE TO CARRY OUT THE WORK IN ACCORDANCE WITH THE CONSTRUCTION DRAWING AND/OR DOCUMENTS.

3. CONTRACTOR SHALL BE RESPONSIBLE FOR PROPER LAYOUT OF IMPROVEMENTS BASED UPON SETBACKS/ PROPERTY LINE LOCATION. DIMENSIONAL RELATIONSHIPS TO EQUIPMENT ARE APPROXIMATE AND ARE FOR ILLUSTRATIVE PURPOSES ONLY.

4. CONTRACTOR TO MAINTAIN ALL DRAINAGE PATHS FREE FROM ANY OBSTRUCTIONS (I.E. DEBRIS AND SILT).

5. CONTRACTOR TO PROVIDE POSITIVE DRAINAGE AWAY FROM EQUIPMENT.

6. IF THE SPECIFIED EQUIPMENT CANNOT BE INSTALLED AS SHOWN ON THESE DRAWINGS, THE SUBCONTRACTOR SHALL PROPOSE AN ALTERNATIVE INSTALLATION FOR APPROVAL BY THE CONTRACTOR AND ENGINEER OF RECORD.

7. SUBCONTRACTOR SHALL DETERMINE ACTUAL ROUTING OF CONDUIT, POWER AND T1 CABLES, GROUNDING CABLES AS SHOWN ON THE POWER, GROUNDING AND TELCO PLAN DRAWING. SUBCONTRACTOR SHALL UTILIZE EXISTING TRAYS AND/OR SHALL ADD PROPOSED TRAYS AS NECESSARY. SUBCONTRACTOR SHALL CONFIRM THE ACTUAL ROUTING WITH THE CONTRACTOR. ROUTING OF TRENCHING SHALL BE APPROVED BY CONTRACTOR.

UTILITY NOTES

1. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO CONTACT BLUESTAKE AT LEAST TWO FULL WORKING DAYS (48 HOURS) PRIOR TO BEGINNING OF ANY EXCAVATING.

2. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO LOCATE ALL STRUCTURES, UNDERGROUND PIPELINES, ELECTRIC AND TELEPHONE CONDUITS, EITHER SHOWN OR NOT SHOWN ON THE PLANS PRIOR TO ANY CONSTRUCTION, AND TO OBSERVE ALL POSSIBLE PRECAUTIONS TO AVOID ANY DAMAGE TO THESE FACILITIES. THE ENGINEERING AND/OR DEVELOPER WILL NOT GUARANTEE ANY ELEVATIONS OR LOCATIONS OF EXISTING UNDERGROUND UTILITIES SHOWN ON THESE PLANS.

3. CONTRACTOR TO VERIFY LOCATION AND ELEVATION OF ALL UTILITY CONNECTIONS.

PROJECT SUMMARY

SITE DATA:
- SITE NAME:
  DIAMOND BELL (STAGECOACH) – TUC FLATHEAD
- SITE ADDRESS:
  15949 W. DIAMOND BELL RANCH RD
- COUNTY:
  PIMA
- MAP/PARCEL#:
  301-65-470
- ZONING:
  CB-1 (LOCAL BUSINESS ZONE)
- JURISDICTION:
  PIMA COUNTY
- OCCUPANCY CLASSIFICATION / TYPE OF CONSTRUCTION:
  U / #B

GEODETIC COORDINATES:
- LATITUDE:
  31° 59' 59.58" N NORTH (NAD83)
- LONGITUDE:
  -111° 18' 12.08" W WEST (NAD83)
- GROUND ELEVATION:
  3,139.87' (NAVD88)

PROJECT AREA:
ADDING 2500 SQ FT OF PROPOSED LEASE AREA

PROJECT DESCRIPTION

ROCKY MOUNTAIN TOWER PROPOSES TO

- ADD PROPOSED 50'-0" X 50'-0" X 8'-0" CHAIN LINK FENCE
- ADD PROPOSED 150'-0" PAINTED MONOPOLE
- ADD PROPOSED (2) 6'-0" CHAIN LINK ACCESS GATE
- ADD PROPOSED CONCRETE PAD
- ADD (1) PROPOSED COMMUNITY H-FRAMES W/800 AMP METER BANK

PROJECT TEAM

TOWER OWNER:
ROCKY MOUNTAIN TOWERS
CONTACT: SHELLY MATHISEN
PHONE: (916) 761-9271

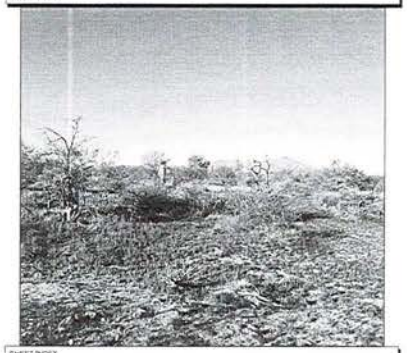
ARCHITECT & ENGINEER:
STATE 48 CONSULTING
114 W. MAIN ST #310
MESA, AZ 85201
CONTACT: DARIO MENDOZA
PHONE: 480.242.2477
EMAIL: DARIO@STATE48CONSULTING.COM

OWNERS

PROPERTY OWNER
MANUEL PADILLA JR.
5311 S. HILDRETH AVE
TUCSON AZ

TOWER OWNER
ROCKY MOUNTAIN TOWERS
CONTACT: SHELLY MATHISEN
PHONE: (916) 761-9271

SITE PHOTO



SHEET INDEX

- T-1 PROJECT INFORMATION AND DATA
- LS-1 SITE SURVEY
- A-1 OVERALL SITE PLAN
- A-2 ENLARGED PLAN
- A-3 ELEVATIONS
- A-4 ELEVATIONS
- A-5 EQUIPMENT & ANTENNA PLAN

VICINITY MAP

DRIVING DIRECTIONS

FROM TUCSON INTERNATIONAL AIRPORT, TUCSON AZ:

HEAD SOUTH ON S. TUCSON BLVD. SLIGHT LEFT TOWER S. TUCSON BLVD. TURN LEFT ONTO S. TUCSON BLVD. TURN LEFT ONTO E. VALENCIA RD. TURN LEFT ONTO AZ-86 W. TURN LEFT ONTO AZ-286 S/SASABE RD. TURN LEFT ONTO W. DIAMOND BELL RANCH RD. THE PROPOSED SITE IS LOCATED ABOUT .16 MILES SOUTH OF THE INTERSECTION OF W. LARKDALE ST AND W. DIAMOND BELL RANCH RD.

CLIENT

PLANS PREPARED BY:
State 48 Development Consulting
WWW.STATE48CONSULTING.COM
114 W. MAIN ST #310
MESA, AZ 85201
480.242.2477 602.621.3987

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AZ	UM

REVISIONS

1	02.09.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

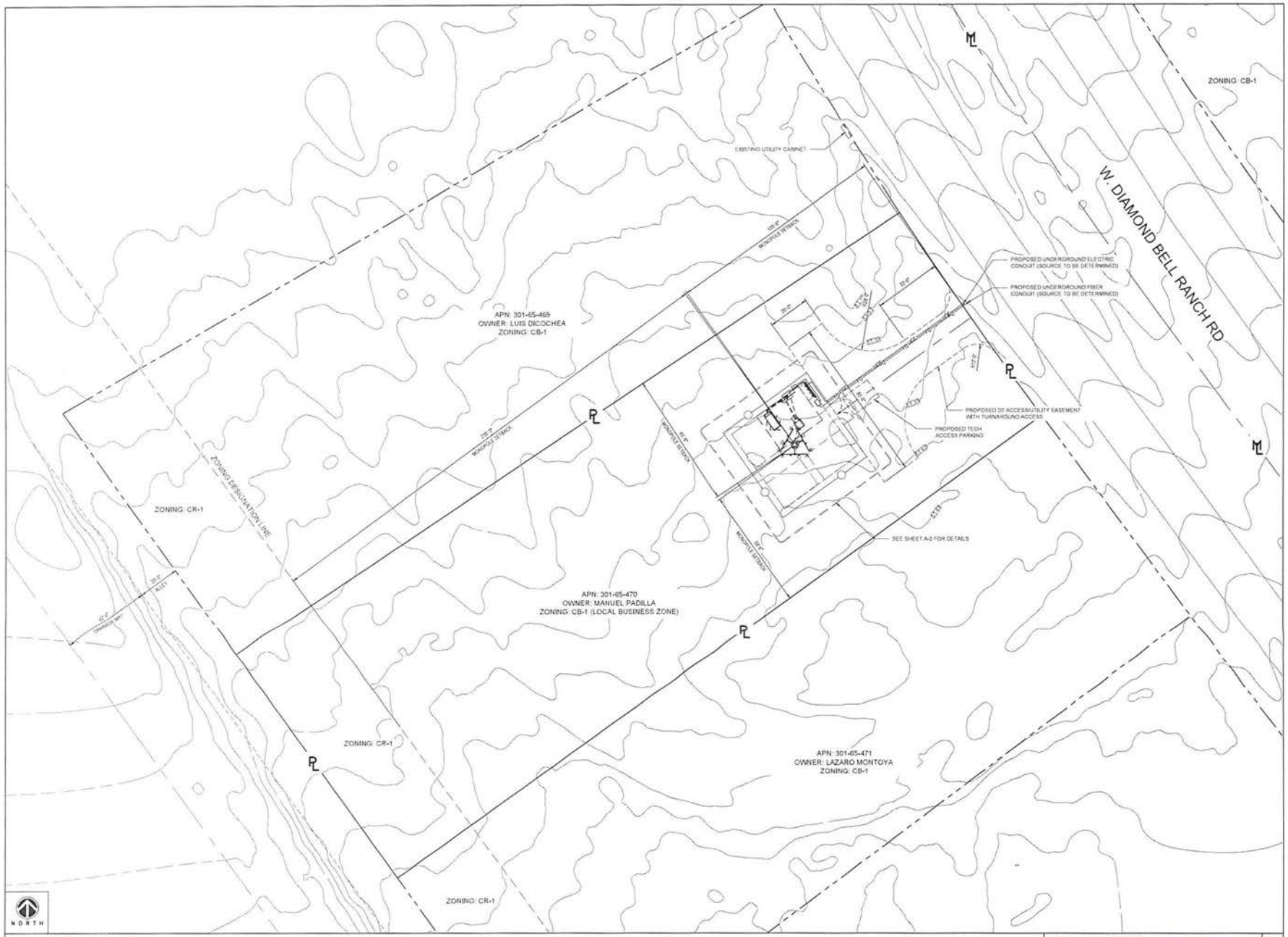
SITE NUMBER
RMT-113

SITE NAME
DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS
15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE
PROJECT INFORMATION AND DATA

SHEET NUMBER
T-1



OVERALL SITE PLAN

24"x36" SCALE: 1" = 20'-0"
12"x18" SCALE: 1" = 40'-0"

1

CLIENT

RMT

PLANS PREPARED BY

State 48 Development Consulting

WWW.STATE48CONSULTING.COM
119 W. MAIN ST #19
MESA, AZ 85201
480-242-2477 623-621-3587

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.06.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

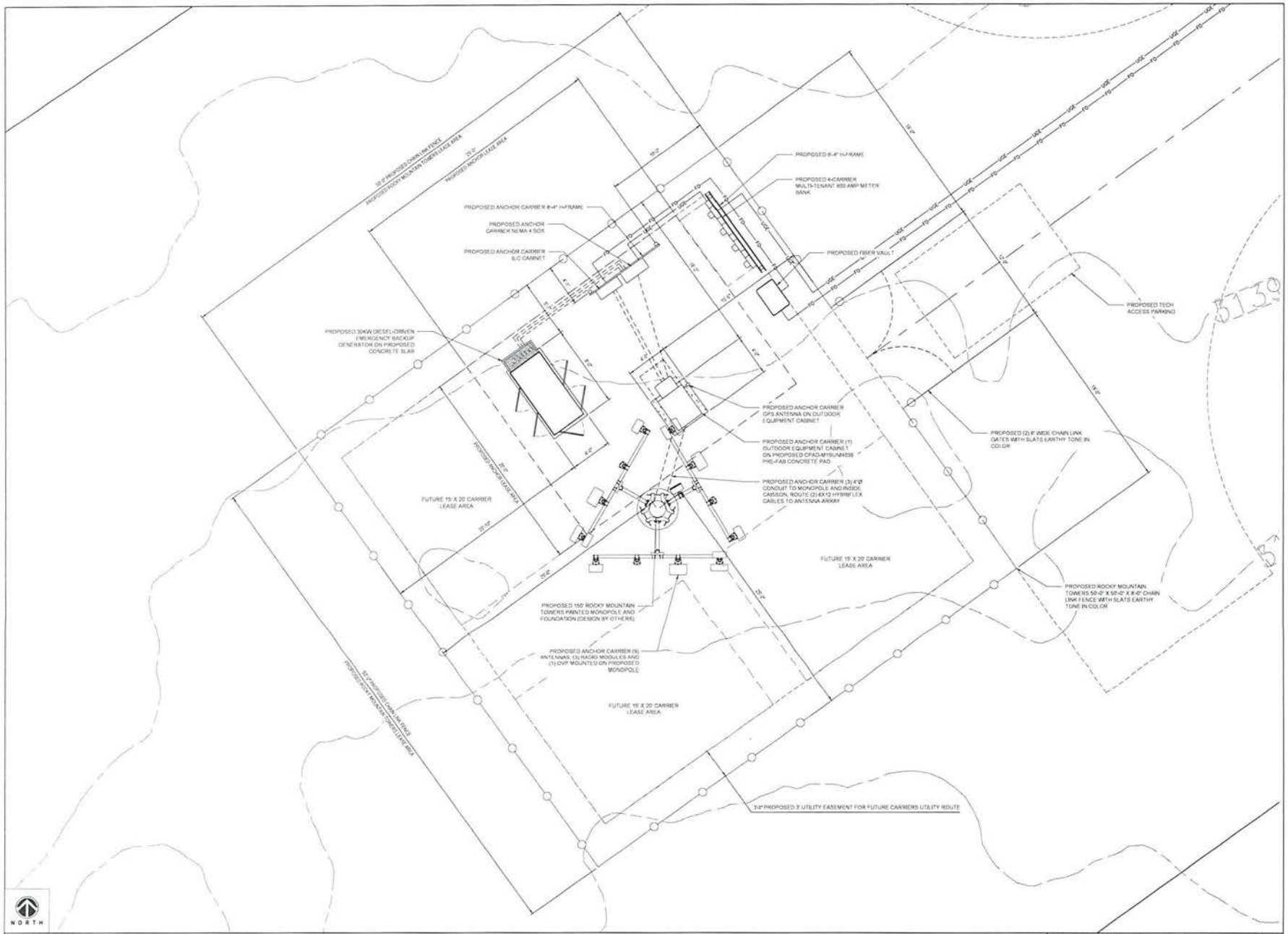
15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

OVERALL SITE PLAN

SHEET NUMBER

A-1



ENLARGED PLAN

24"x36" SCALE: 1/4" = 1'-0"
12"x18" SCALE: 1/8" = 1'-0"

1

CLIENT

RMT

PLANS PREPARED BY

State 48 Development Consulting

WWW.STATE48CONSULTING.COM
119 W. MAIN ST #010
MESA, AZ 85201
480.243.3477 602.621.0887

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PROJECT NUMBER	DRAWN BY	CHK'D BY
PENDING	AJ	DM

REVISIONS

1	02.09.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

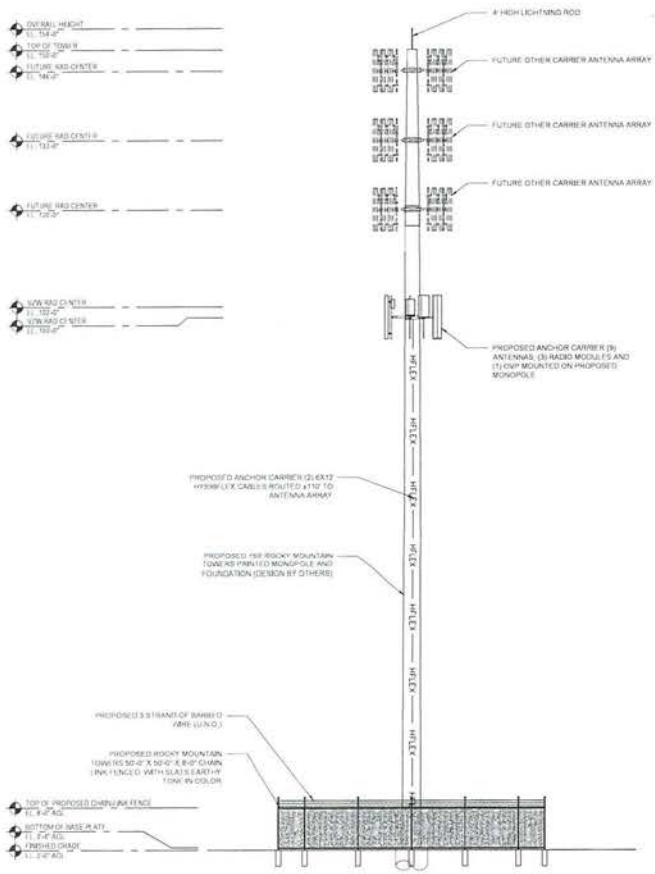
15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

ENLARGED PLAN

SHEET NUMBER

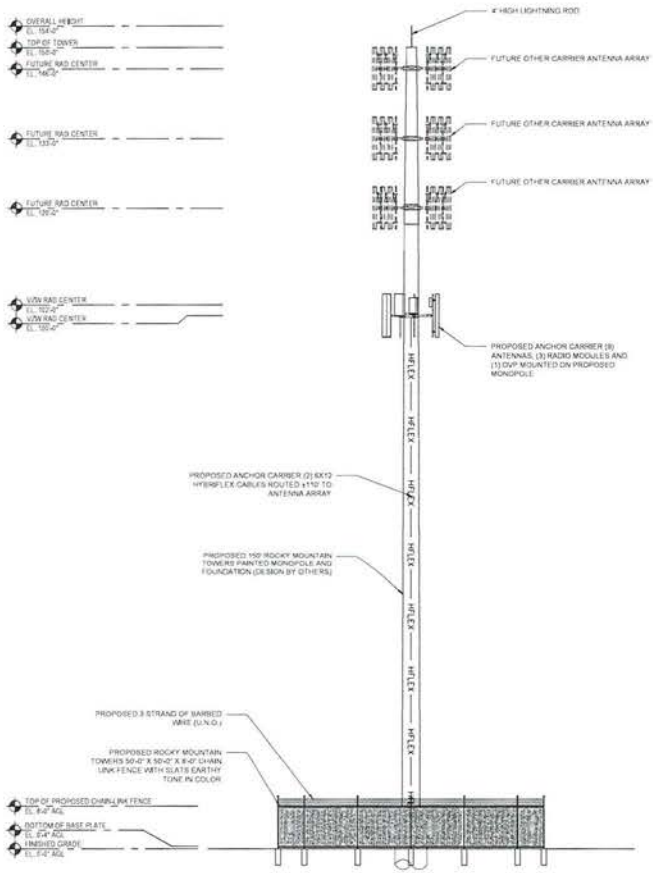
A-2



PROPOSED SOUTH ELEVATION

24"x36" SCALE: 3/32" = 1'-0"
12"x18" SCALE: 3/64" = 1'-0"

1



PROPOSED EAST ELEVATION

24"x36" SCALE: 3/32" = 1'-0"
12"x18" SCALE: 3/64" = 1'-0"

2

CLIENT

RMT

PLANS PREPARED BY

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Development Consulting

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.04.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

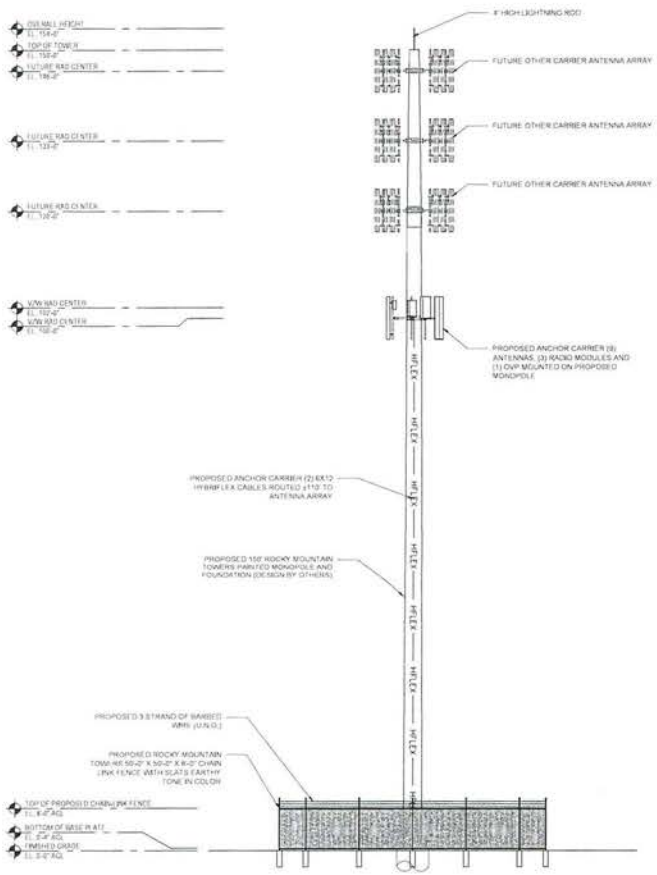
15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

ELEVATIONS

SHEET NUMBER

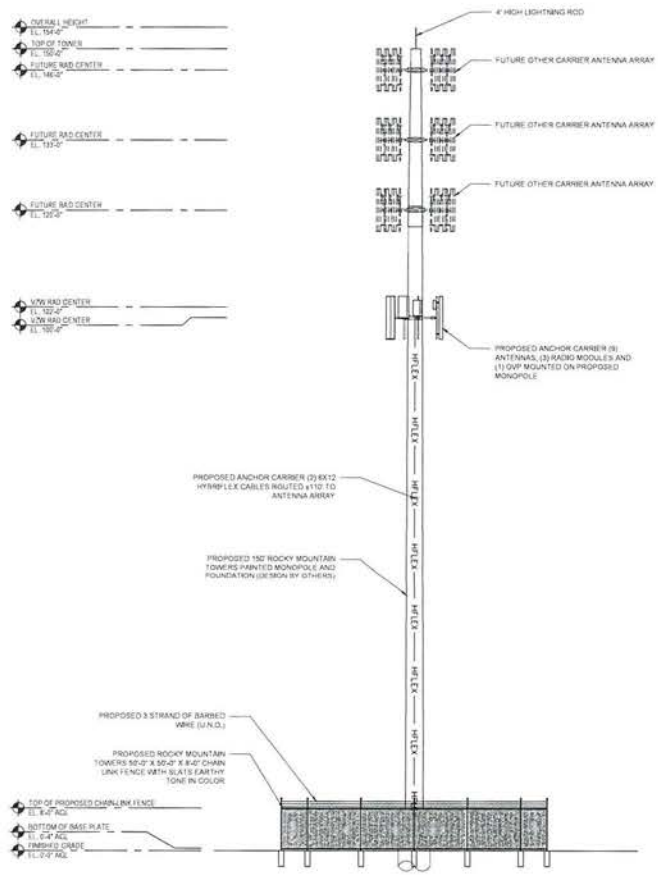
A-3



PROPOSED NORTH ELEVATION

24"x36" SCALE: 3/32" = 1'-0"
12"x18" SCALE: 3/64" = 1'-0"
8' 4' 0' 8'

1



PROPOSED WEST ELEVATION

24"x36" SCALE: 3/32" = 1'-0"
12"x18" SCALE: 3/64" = 1'-0"
8' 4' 0' 8'

2

CLIENT

RMT

PLANS PREPARED BY

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Development Consulting

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114 W. 5th ST. #210
MESA, AZ 85201
480-242-2477 602-671-3587

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.09.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

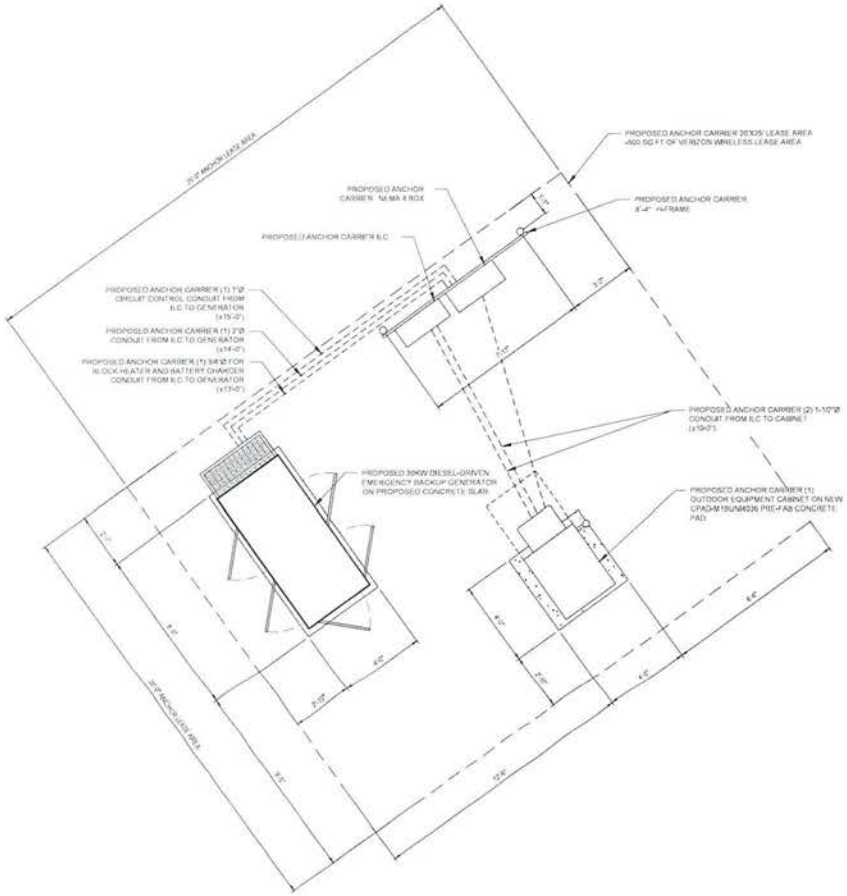
15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

ELEVATIONS

SHEET NUMBER

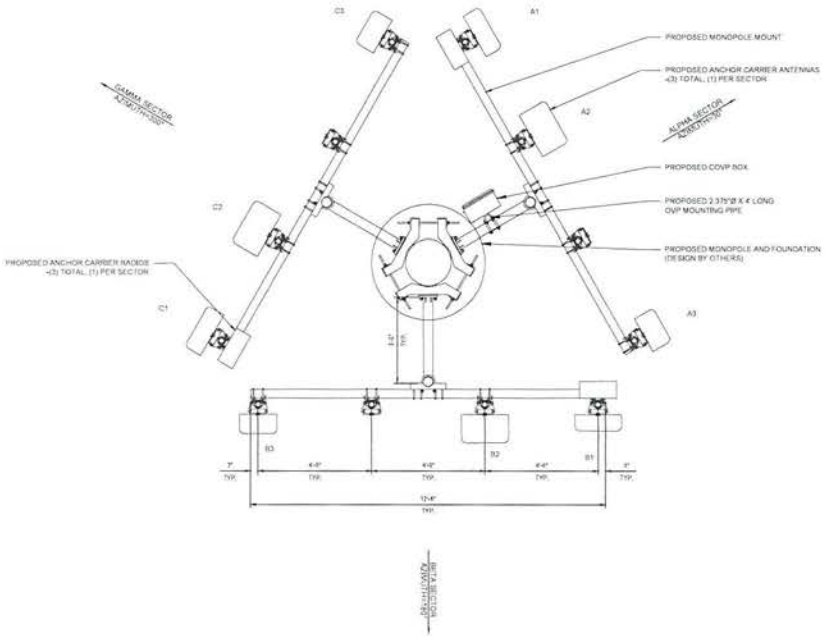
A-4



ENLARGED SITE PLAN

24"x36" SCALE: 1/2" = 1'-0"
12"x18" SCALE: 1/4" = 1'-0"

1



ANTENNA CONFIGURATION

24"x36" SCALE: 1/2" = 1'-0"
12"x18" SCALE: 1/4" = 1'-0"

2

CLIENT

RMT

PLANS PREPARED BY

State 48 Development Consulting

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.09.26	ZONING DRAWINGS
2	03.20.26	ZONING SUBMITTAL

ZONING SUBMITTAL

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) - TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

EQUIPMENT & ANTENNA PLAN

SHEET NUMBER

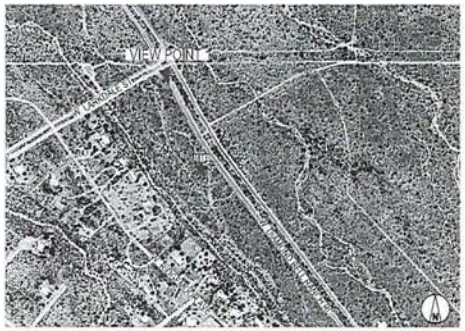
A-5

PHOTO SIMULATION KEY NOTES

1. PROPOSED ROCKY MOUNTAIN TOWERS 150' MONOPOLE WITH ANTENNAS

NOTES:

SIMULATIONS ARE AN ARTISTIC ILLUSTRATION CREATED TO REPRESENT HOW THE PROPOSED PROJECT MAY LOOK ONCE CONSTRUCTED. SIMULATIONS ARE CREATED TO MATCH THE CURRENT DESIGN AS ACCURATELY AS POSSIBLE, BUT ARE NOT GUARANTEED TO MATCH THE FINAL BUILD.



BEFORE:

AFTER:

CLIENT:

RMT

PLANS PREPARED BY:

State 48
Development Consulting

WWW.STATE48CONSULTING.COM
114 W. MAIN ST #210
MESA, AZ 85201
480-242-2477 602-621-2687

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS:

1	02.20.26	PHOTO SIMULATIONS

PHOTO SIMULATIONS

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

LOOKING SOUTH FROM THE INTERSECTION OF W. DIAMOND BELL RANCH RD & W. LARKDALE ST

SHEET NUMBER

PS-1

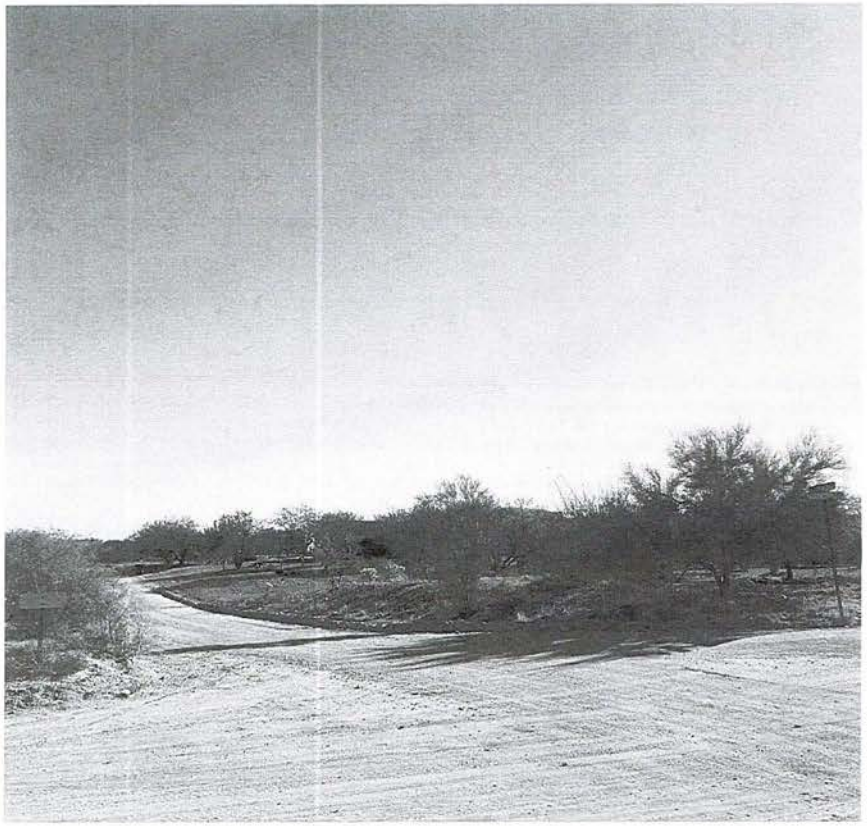
PHOTO SIMULATION KEY NOTES

1. PROPOSED ROCKY MOUNTAIN TOWERS 150' MONOPOLE WITH ANTENNAS

NOTES:

SIMULATIONS ARE AN ARTISTIC ILLUSTRATION CREATED TO REPRESENT HOW THE PROPOSED PROJECT MAY LOOK ONCE CONSTRUCTED. SIMULATIONS ARE CREATED TO MATCH THE CURRENT DESIGN AS ACCURATELY AS POSSIBLE, BUT ARE NOT GUARANTEED TO MATCH THE FINAL BUILD.

BEFORE:



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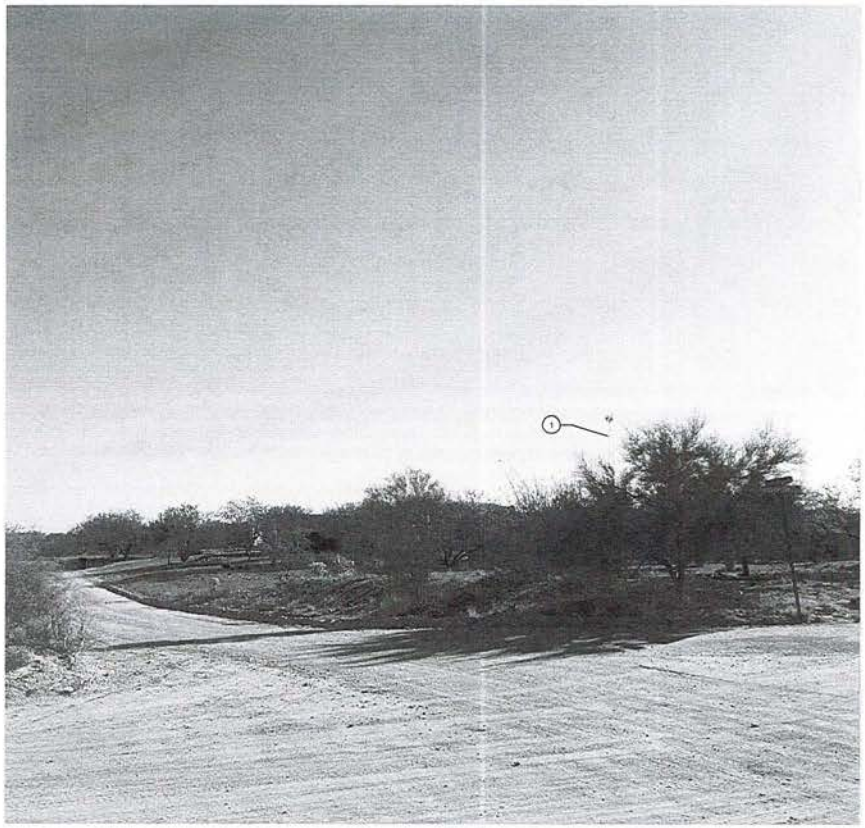

CLIENT:

RMT

PLANS PREPARED BY:

State 48 Development Consulting

WWW.STATE48CONSULTING.COM
114 W. MAIN ST #210
MESA, AZ 85201
480-243-2477 602-621-2667

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.20.26	PHOTO SIMULATIONS

PHOTO SIMULATIONS

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

LOOKING SOUTHEAST FROM INTERSECTION OF W. LARKDALE ST & W. RIDGEMOOR AVE

SHEET NUMBER

PS-2

PHOTO SIMULATION KEY NOTES

1. PROPOSED ROCKY MOUNTAIN TOWERS 150' MONOPOLE WITH ANTENNAS

NOTES:

SIMULATIONS ARE AN ARTISTIC ILLUSTRATION CREATED TO REPRESENT HOW THE PROPOSED PROJECT MAY LOOK ONCE CONSTRUCTED. SIMULATIONS ARE CREATED TO MATCH THE CURRENT DESIGN AS ACCURATELY AS POSSIBLE, BUT ARE NOT GUARANTEED TO MATCH THE FINAL BUILD.

BEFORE:

AFTER:

CLIENT:

RMT

PLANS PREPARED BY:

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114 W. MAIN ST #110
MESA, AZ 85201
480-242-2677 602-471-3567

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.20.26	PHOTO SIMULATIONS

PHOTO SIMULATIONS

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

LOOKING NORTHWEST FROM W. DIAMOND BELL RANCH RD

SHEET NUMBER

PS-3

PHOTO SIMULATION KEY NOTES

1. PROPOSED ROCKY MOUNTAIN TOWERS 150' MONOPOLE WITH ANTENNAE

NOTES:

SIMULATIONS ARE AN ARTISTIC ILLUSTRATION CREATED TO REPRESENT HOW THE PROPOSED PROJECT MAY LOOK ONCE CONSTRUCTED. SIMULATIONS ARE CREATED TO MATCH THE CURRENT DESIGN AS ACCURATELY AS POSSIBLE, BUT ARE NOT GUARANTEED TO MATCH THE FINAL BUILD.

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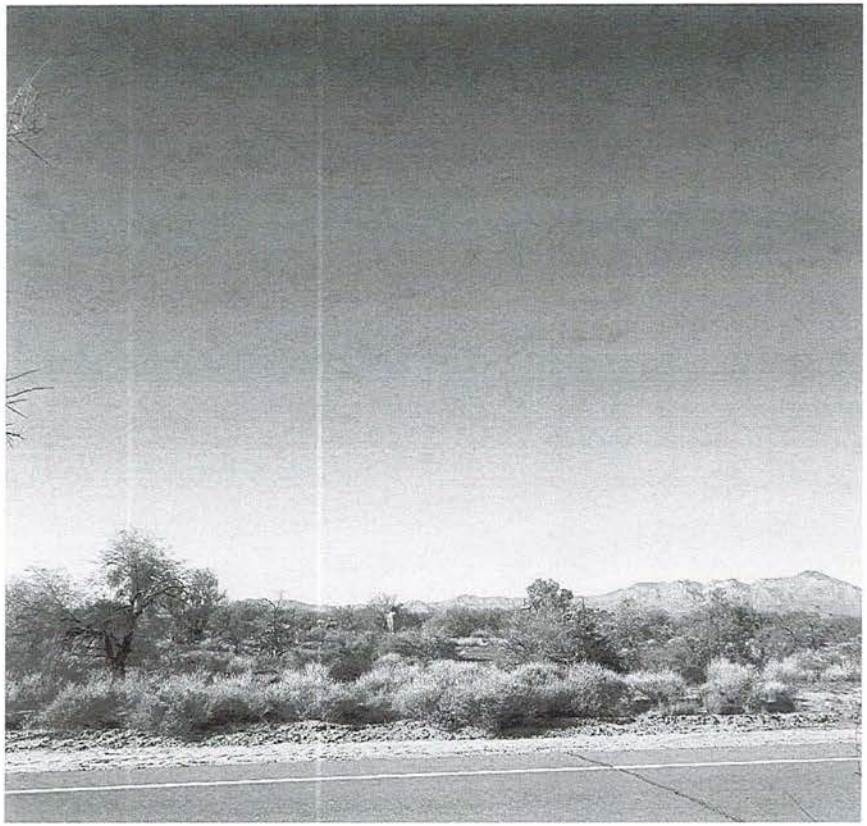

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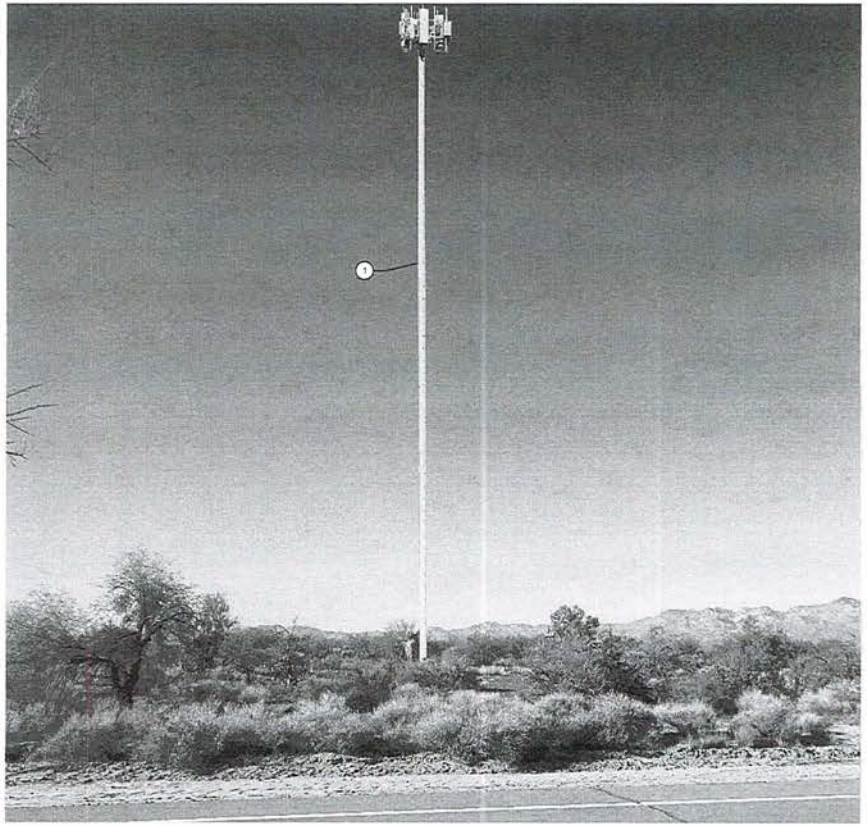

CLIENT:

RMT

PLANS PREPARED BY:

State 48 Development Consulting

WWW.STATE48CONSULTING.COM
116 W. MAIN ST. #310
MESA, AZ 85201
480-240-2477 602-625-2567

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.20.26	PHOTO SIMULATIONS

PHOTO SIMULATIONS

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

LOOKING WEST FROM W. DIAMOND BELL RANCH RD

SHEET NUMBER

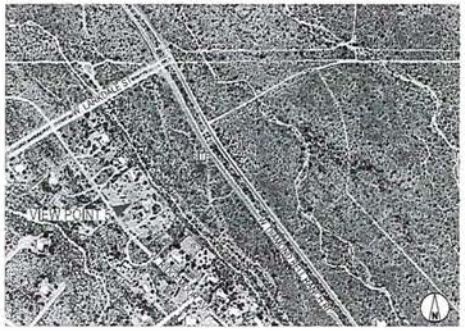
PS-4

PHOTO SIMULATION KEY NOTES

1. PROPOSED ROCKY MOUNTAIN TOWERS 150' MONOPOLE WITH ANTENNAS

NOTES:

SIMULATIONS ARE AN ARTISTIC ILLUSTRATION CREATED TO REPRESENT HOW THE PROPOSED PROJECT MAY LOOK ONCE CONSTRUCTED. SIMULATIONS ARE CREATED TO MATCH THE CURRENT DESIGN AS ACCURATELY AS POSSIBLE, BUT ARE NOT GUARANTEED TO MATCH THE FINAL BUILD.



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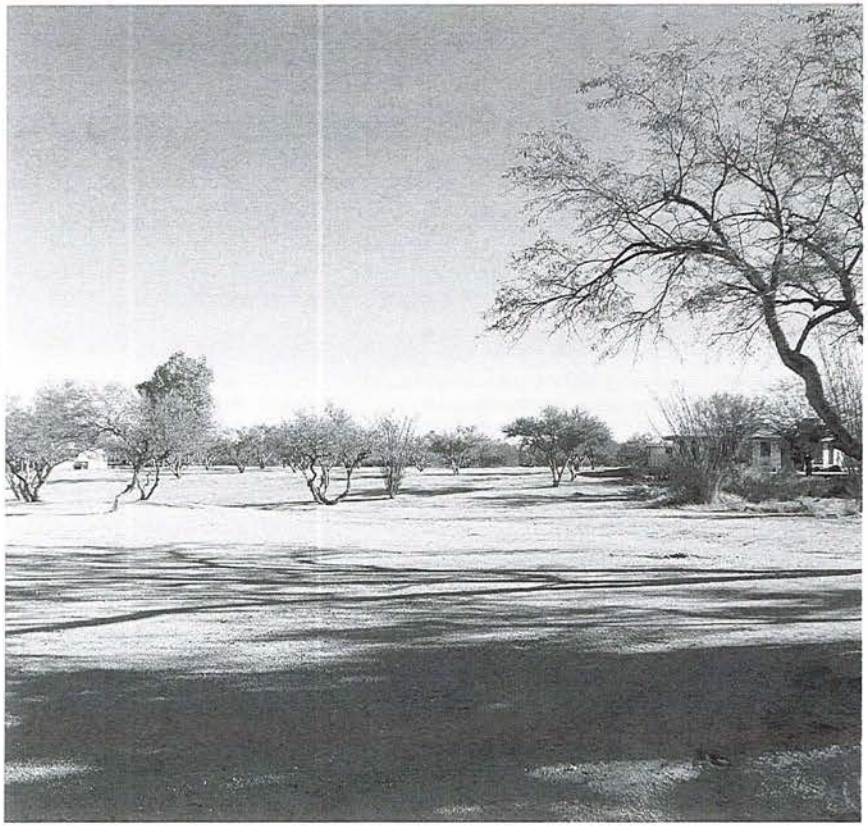

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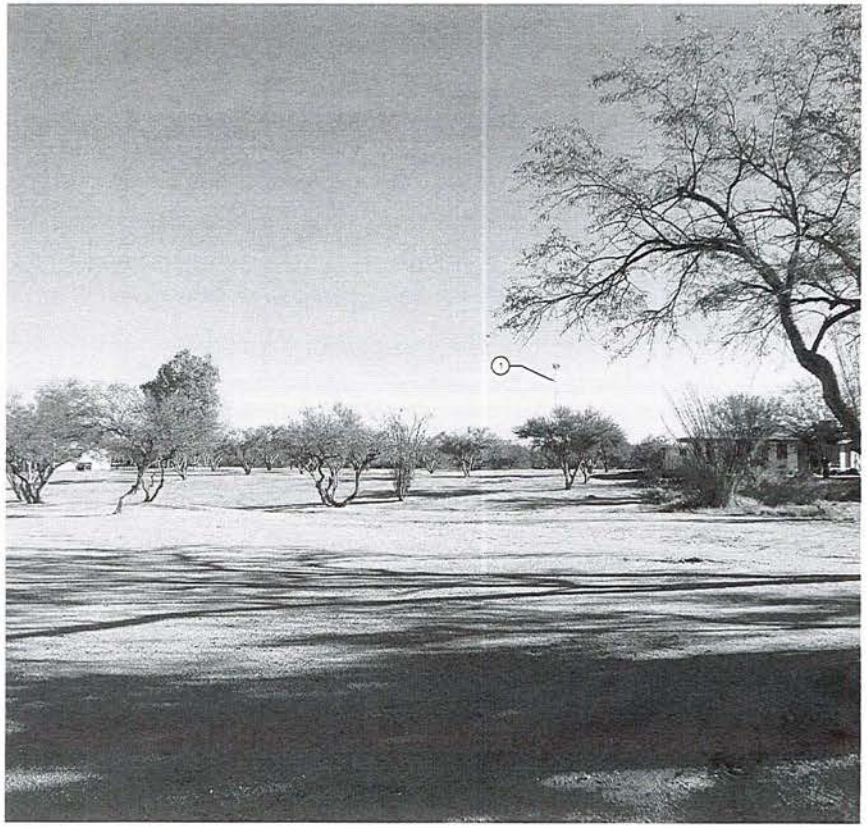

CLIENT:

RMT

PLANS PREPARED BY:

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WWW.STATE48CONSULTING.COM
114 W. MAIN ST #212
MESA, AZ 85201
480-242-2417 602-671-2567

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PROJECT NUMBER	DRAWN BY	CHKD BY
PENDING	AJ	DM

REVISIONS

1	02.25.26	PHOTO SIMULATIONS

PHOTO SIMULATIONS

SITE NUMBER

RMT-113

SITE NAME

DIAMOND BELL (STAGECOACH) TUC FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

LOOKING NORTHEAST FROM W. RIDGEMOOR AVE

SHEET NUMBER

PS-5

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Conditional Use Permit Narrative

Diamond Bell (Stagecoach) – TUC Flathead Telecommunications Facility

Project Name: Diamond Bell (Stagecoach) – TUC Flathead
Site Address: 15949 W. Diamond Bell Ranch Road
Applicant: Rocky Mountain Towers
Property Owner: Manual Padilla
Jurisdiction: Pima County, Arizona
Permit Type: Type III Conditional Use Permit – Communication Tower

---

Project Description

Rocky Mountain Towers requests approval of a Type III Conditional Use Permit for the construction of a new 150-foot monopole telecommunications tower and associated ground equipment at the above-referenced site.

The proposed facility will include a 50-foot by 50-foot fenced lease area designed to accommodate the initial installation and future co-location of additional wireless carriers. The anchor tenant, Verizon Wireless, will install nine (9) antennas, three (3) remote radio units (RRUs), and one (1) overvoltage protection (OVP) unit at a rad center of approximately 100 feet on the monopole. Two hybrid fiber cables will be routed internally along the center of the monopole to connect ground-based equipment to the antenna array.

The tower is structurally designed to support up to three (3) additional wireless carriers, which promotes co-location and reduces the need for additional towers within the surrounding area.

The proposed facility is intended to address an existing wireless coverage and capacity gap in the area and will improve reliability for voice, data, and emergency communications, including enhanced support for E911 services.

Zoning and Permit Applicability

The subject parcel is primarily zoned CB-1 (Local Business Zone), with a small portion of the southwest area zoned CR-1 (Residential Zone). The proposed tower and equipment compound are located entirely within the CB-1 portion of the parcel.

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Pursuant to Pima County Code §18.07.030(H), communication towers are permitted subject to Conditional Use Permit approval. As a new tower, this project is processed as a Type III Conditional Use Permit in accordance with Chapter 18.97.

The CB-1 zoning designation is appropriate for this use, as it accommodates infrastructure of this type and is one of the limited zoning classifications in the area not restricted by residential CC&Rs that prohibit telecommunication towers.

Compliance with Development Standards

The proposed facility complies with the applicable standards of §18.07.030(H) and other relevant provisions of the Pima County Zoning Code:

Setbacks:
The tower has been sited to meet or exceed all applicable setback requirements. The proposed setbacks are as follows:

- **Front property line:** 105 feet, 6 inches
- **Northwest side property line:** 65 feet, 6 inches
- **Southeast side property line:** 58 feet, 6 inches
- **Rear (southwest) to zoning designation line (CR-1):** 235 feet, 3 inches

These setbacks exceed the minimum required distances from nonresidential lot lines and provide substantial separation from the adjacent residential zoning area.

Access:
Access to the site will be provided via Diamond Bell Ranch Road, a publicly maintained road, in compliance with code requirements. The Applicant is proposing a new road approach from Diamond Bell Ranch Road to serve the facility and has been informed that a right-of-way permit will be required. The Applicant understands that access approval will be reviewed and processed as part of the Conditional Use Permit process.

Parking:
The facility includes a hammerhead turnaround at the gate side of the compound, which serves as a designated parking area for maintenance access.

Fencing and Security:
The equipment compound will be enclosed by an 8-foot-tall security fence topped with three strands of barbed wire. The barbed wire will be installed in compliance with code requirements for nonresidential zones, including placement above 6 feet above grade. The fence will be equipped with privacy slats colored to match the tower, allowing the facility to blend with the tones of the surrounding natural environment.

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Lighting:
Any security lighting will be fully shielded and directed downward to ensure that the light source is not visible from adjoining residential properties and does not create glare.

Landscaping Waiver / Alternative – Chapter 18.73

Pursuant to Chapter 18.73, landscaping is typically required to screen the equipment area from adjacent residential uses and public streets. The Applicant respectfully requests a waiver of these requirements.

The proposed facility is located within a rural, open landscape characterized by natural grasses, minimal vegetation, and a lack of formal or ornamental landscaping features. The introduction of irrigated plantings, shrubs, or trees would be inconsistent with the existing character of the area and would introduce elements not typical of surrounding land uses.

The majority of the parcel is zoned CB-1, with only a small portion of the southwest area zoned CR-1. The tower and equipment compound are located approximately 235 feet from the CR-1 zoning boundary, which extends approximately 284 feet to the rear property line. Beyond this boundary is an approximately 120-foot-wide dry riverbed, creating a natural buffer between the site and the nearest residential property.

As a result, the total distance from the tower to the nearest residential use is approximately 400 feet. Given this separation and intervening terrain, the facility will not be visible from adjacent residential properties or public streets in a manner that would warrant or benefit from additional landscaping.

As an alternative, the equipment compound will be enclosed by secure fencing, which provides adequate screening, security, and visual containment while maintaining compatibility with the surrounding rural environment. The fence will include privacy slats colored to match the tower, helping the facility blend with the tones of the surrounding natural landscape.

Application Requirements – §18.07.030(H)(3)

This application includes materials required for a new communication tower, including:

- Zoning drawings, which include the site plan showing the tower and equipment compound, detailed layout of the fenced lease area, equipment placement, and compound configuration. The zoning drawings also include elevation drawings of the proposed monopole and associated equipment, antenna mounting details, and structural design information. Additionally, the drawings depict the proposed access drive and

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connection to Diamond Bell Ranch Road, and include survey information identifying existing conditions, property lines, and all applicable setbacks demonstrating compliance with zoning requirements.

- Photo simulations depicting before and after views of the proposed facility, illustrating how the monopole's sandy, earthy color palette is designed to blend with the surrounding desert landscape. The simulations demonstrate that the tower will visually integrate with the natural tones of the area, minimizing contrast and reducing overall visual impact when viewed from nearby vantage points.
- RF Design Analysis with propagation maps (before and after), signed by a qualified RF engineer
- Map showing the location of property owners within the required 1,000-foot radius from the tower location.
- Deed to property, including legal description and ownership information.
- Redacted Deed to the Property demonstrating landowners' authorization for the application.
- Biological impact report (Phase 1 Environmental Assessment)

The Applicant will also provide the following as required:

- FCC and FAA compliance documentation prior to issuance of building permits
- Written evidence of at least one committed carrier
- As-built photo documentation following construction

Community Necessity / RF Gap / Alternatives Analysis

The proposed facility is necessary to address an existing gap in wireless coverage and capacity in the surrounding area. Existing facilities are too distant, lack sufficient height, or are otherwise incapable of meeting current service demands.

An RF Design Analysis prepared by **Steven Kennedy of Biwabkos Consultants, LLC**, an independent radio frequency engineer with over 35 years of experience, confirms that:

- A significant coverage gap exists in the area
- Existing structures cannot meet coverage or capacity needs
- The proposed facility effectively remedies the identified gap

Alternative sites and co-location opportunities were evaluated but were not feasible due to insufficient height, location constraints, structural limitations, or inability to meet RF objectives.

Additionally, the majority of parcels within the search area are zoned CR-1 and are subject to HOA CC&Rs prohibiting telecommunication towers, significantly limiting viable site options. Only a small number of parcels—approximately a few dozen—are zoned CB-1 and not subject to these

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restrictions. The subject property is one of these limited CB-1 parcels and represents a uniquely suitable and code-compliant location.

Type III Conditional Use Permit Process – Chapter 18.97

Applicant acknowledges that this request is processed as a **Type III Conditional Use Permit**, which includes:

- Full public notification
- Staff review and report
- Public hearing before the Planning & Zoning Commission
- Final decision by the Board of Supervisors

Applicant further acknowledges that the approval is tied to the preliminary development plan and will expire if not exercised within 9 months, with a single 12-month extension available.

Conclusion

The proposed telecommunications facility complies with the applicable provisions of the Pima County Zoning Code and satisfies the requirements for a Type III Conditional Use Permit.

The site is appropriately zoned, meets all development standards, including setbacks and access, and is one of the few viable locations capable of addressing the demonstrated coverage gap due to zoning and land use constraints in the surrounding area.

For these reasons, Rocky Mountain Towers respectfully requests approval of this application.

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WIRELESS NETWORK CONSULTING

Biwabkos Consultants LLC

Rocky Mountain Tower
Site 113 Diamond Bell
Verizon TUC_FLATHEAD Site
Coverage & Capacity Site

RF DESIGN ANALYSIS

2026

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Certification

This analysis and report was completed by Steven Kennedy an Independent Radio Frequency Engineer with over 35 years of experience in Wireless Network Engineering.

I certify that the attached RF analysis and report is correct to the best of my knowledge, and all calculations, assumptions and conclusions are based on generally acceptable engineering practices

Steven E Kennedy

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Arizona Engineer Seal

I certify that the attached RF analysis and report is correct to the best of my knowledge, and all calculations, assumptions and conclusions are based on generally acceptable engineering practices:

2026

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Coverage vs Capacity

- **Capacity is providing bandwidth or processing capacity to service the customers in the area.**
  - Areas where large numbers of users are in a specific geographic areas
  - Areas where users are demanding higher data rates for services
  - Areas with a large amount of indoor users
- **Coverage is Providing Service where service does not exist, calls drop, or "no service".**
  - Areas where sites are farther apart
  - Areas where terrain or buildings block signals
  - Areas where indoor service is low or nonexistent

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Objective of new site

- **Coverage**
  - Provide coverage to the rural wireless users in Diamond Bell Ranch and Mira Bell
  - Provide coverage along Hwy 286 coming South from Three Points
- **Capacity**
  - The sites to the North and South of the proposed are over capacity and throughput per user is low
- **Why is this site important?**
  - 96% of Americans own a Cellular Phone
  - 57% of American Homes rely exclusively on cellular phones
  - 84% or more of 9-1-1 emergency calls are made from wireless devices

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Proposed Site

- 150′ Monopole Tower
  - With 4′ lightning rod
  - 15949 W Diamond Bell Ranch Road
  - Tucson, AZ 85736
    - Latitude: 31.999883 N (NAD83)
    - Longitude: -111.303350 W (NAD83)
    - Ground Elevation: 3139.87' (NAVD88)
    - Anchor tenant is Verizon
  - Antenna Centerline at 146′ AGL

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Why here?

- Sites covering the area are over capacity and need offload from a new site
- Significant amount of increased network use in the suburban and rural areas of Arizona.
- This site will also increase coverage in the area around the proposed
- Crowdsource data is showing needs for increased coverage around the proposed

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Zoom – proposed site

2026

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Existing Sites (all carriers)

2026

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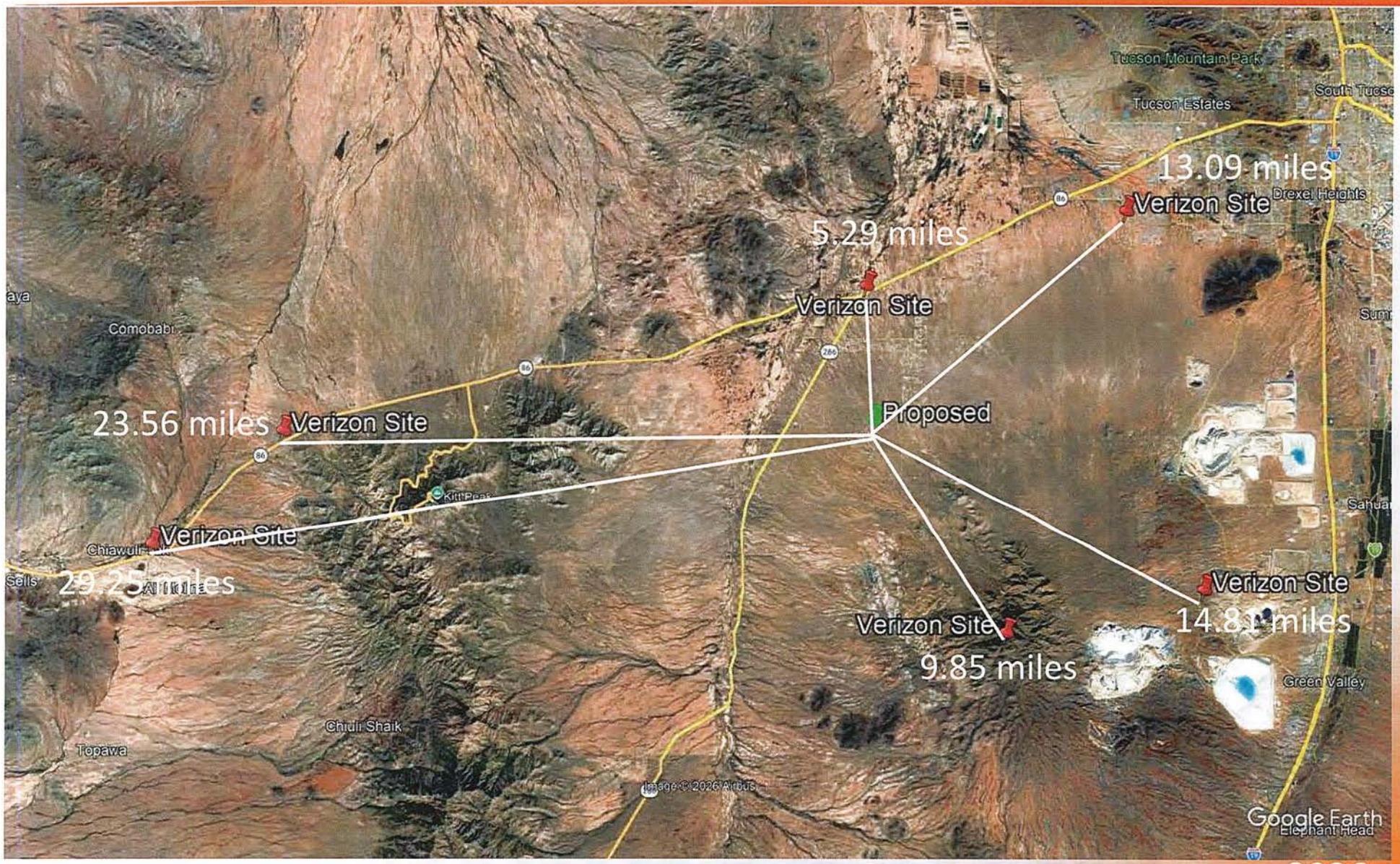
Verizon Sites



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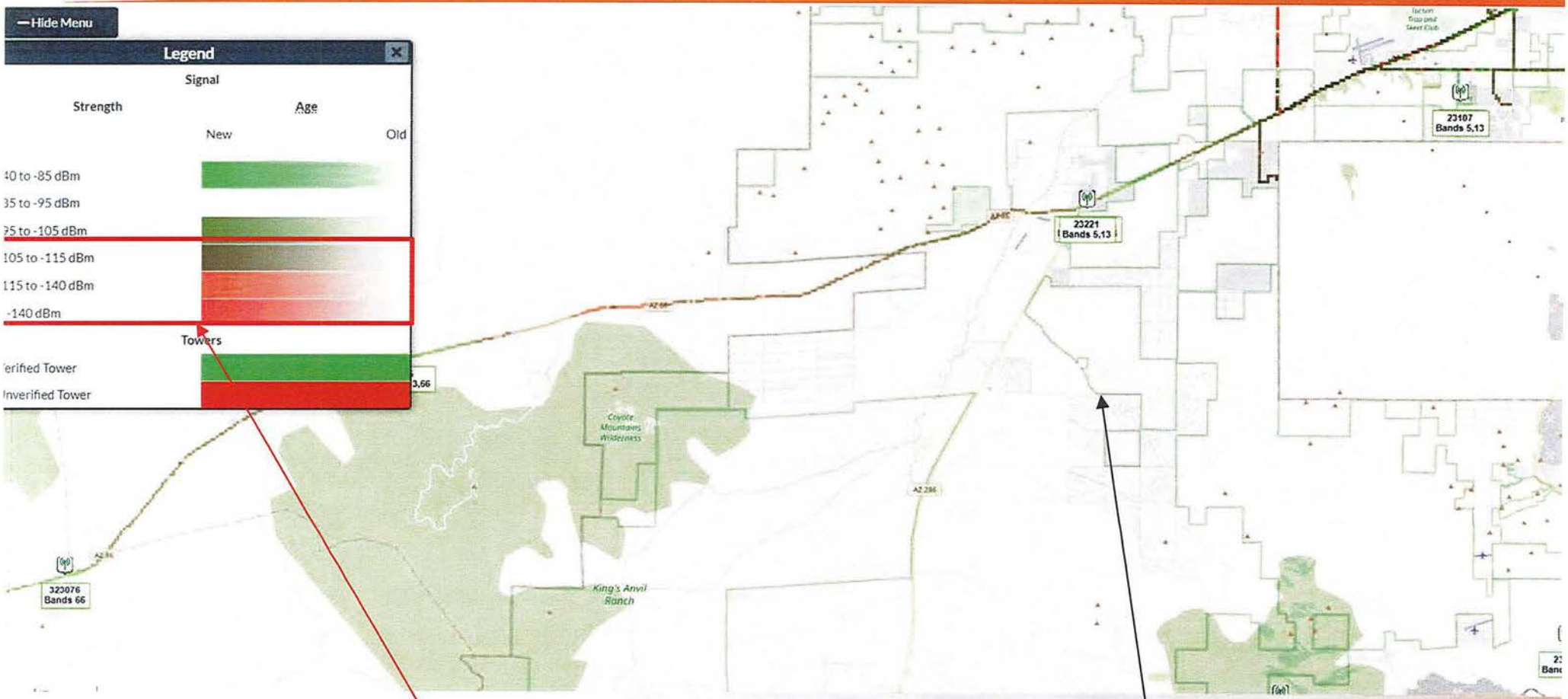
CellMapper Data for Verizon

Source https://cellmapper.net



Poor Service Quality

Proposed Site

2026

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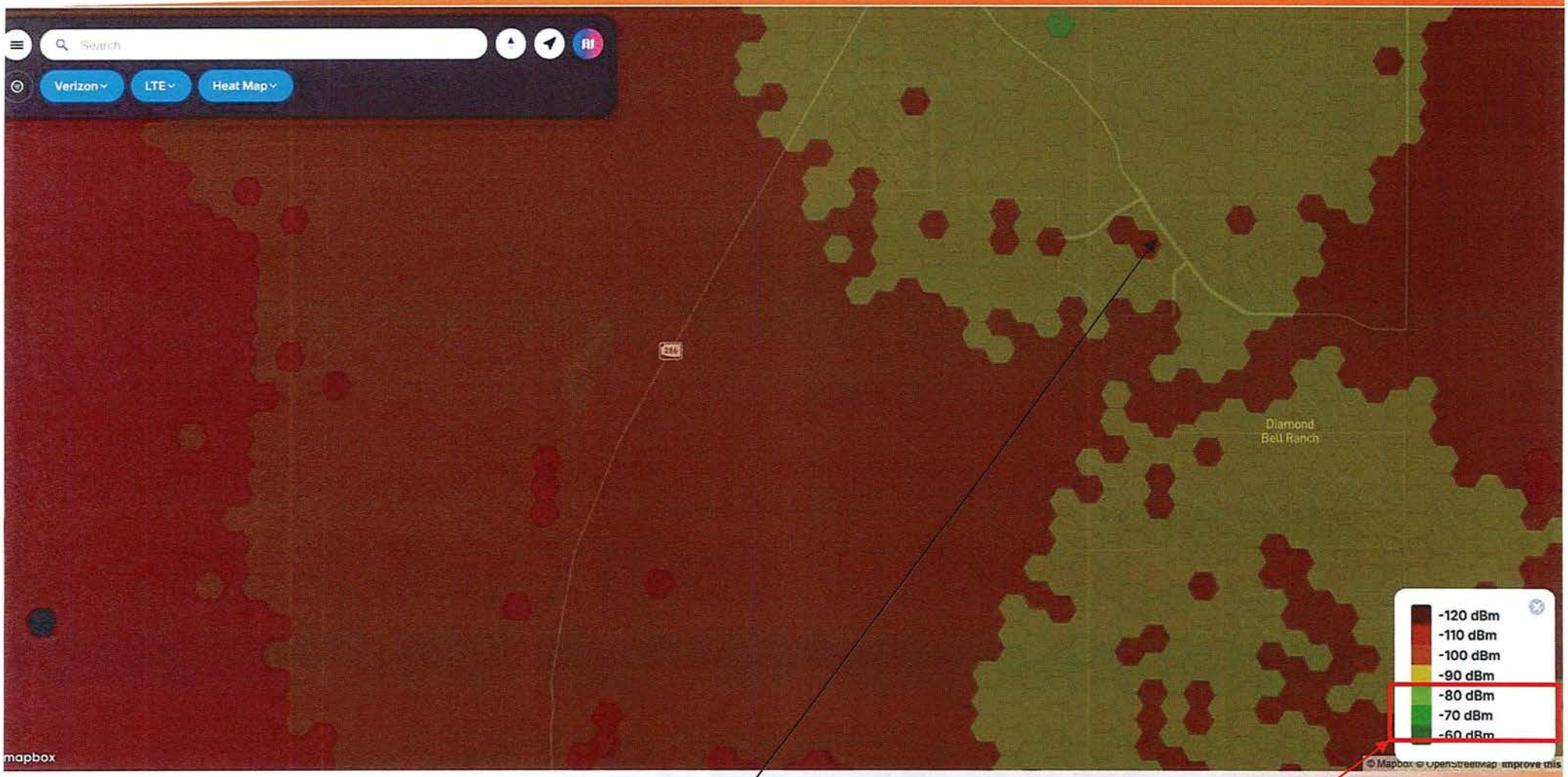
Coverage Map Data for Verizon

Source https://map.coveragemap.com



Proposed Site

Poor Service Quality

2026

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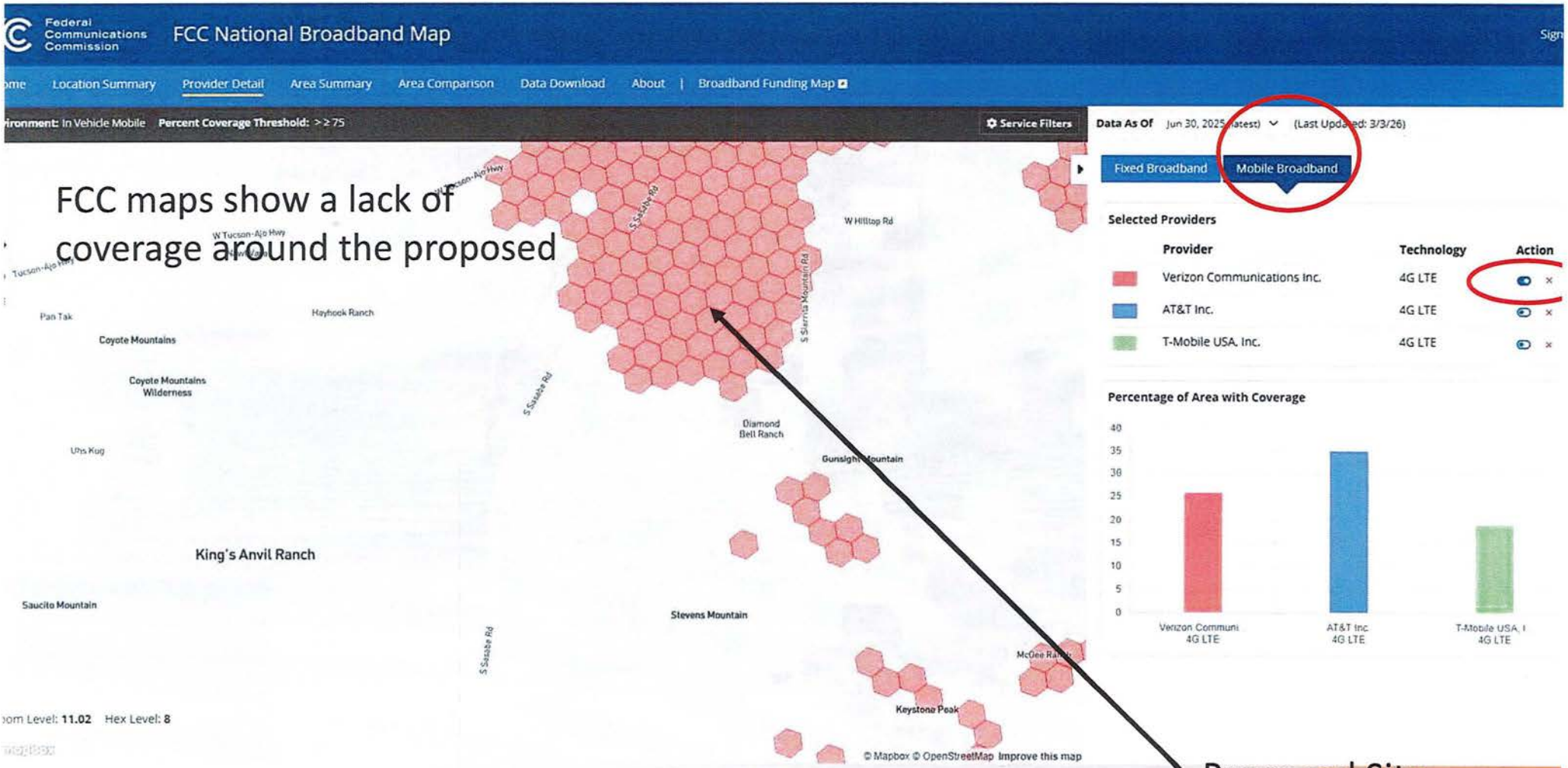
FCC Broadband Map
Verizon In-Vehicle Mobile

Source: https://broadbandmap.fcc.gov/home



FCC maps show a lack of coverage around the proposed

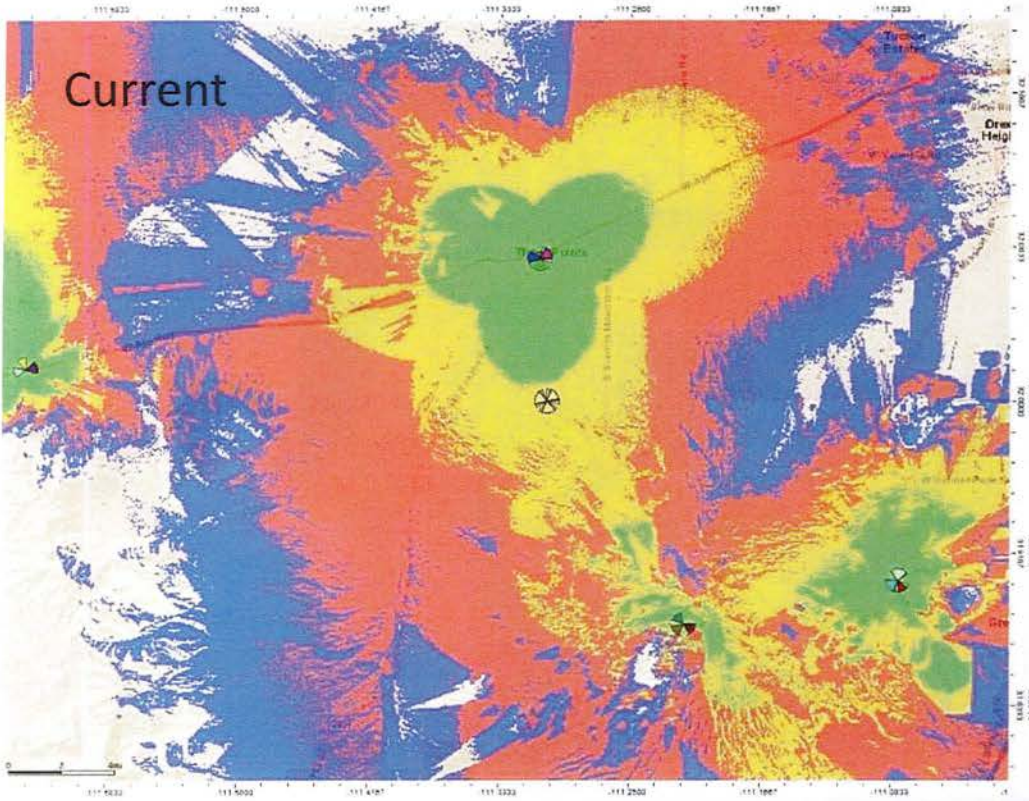
Proposed Site

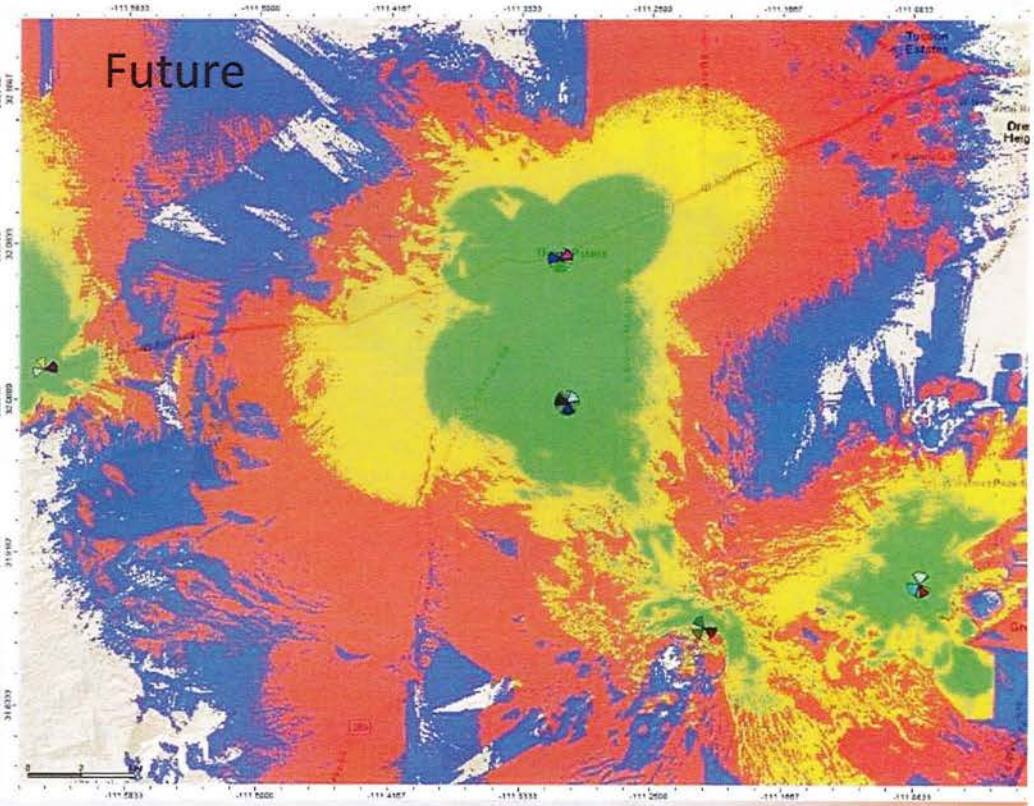
2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

RSRP Coverage
700 MHz - low band

LEGEND	
	Indoor >= -85 dbm
	In-Vehicle >= -95 dbm
	Outdoor >= -106 dbm
	Marginal >= -115 dbm





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RSRP - Current Coverage 700 MHz - low band

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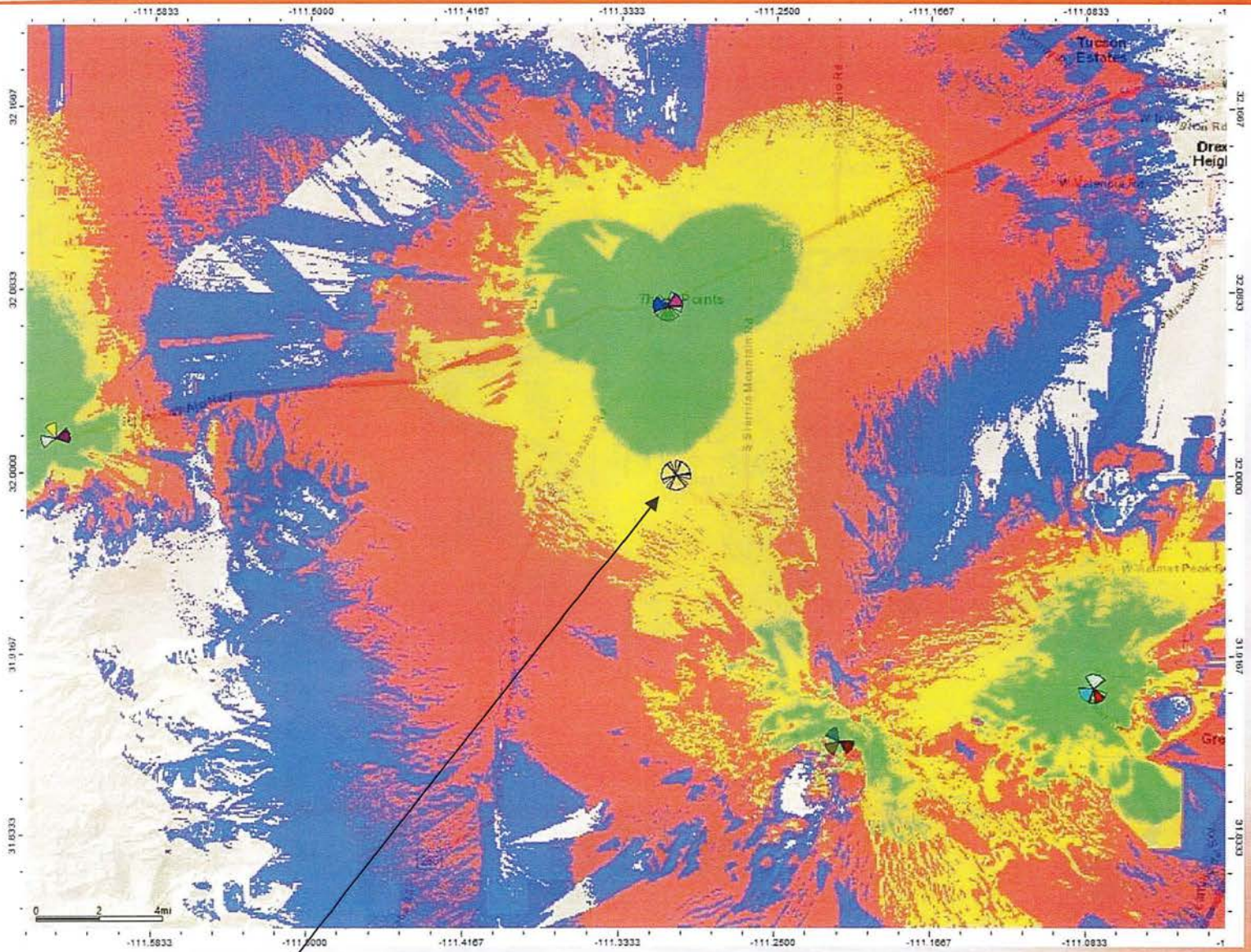
	Outdoor >= -106 dbm
	Marginal >= -115 dbm



Proposed Site

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

RSRP – Proposed Coverage 700 MHz - low band

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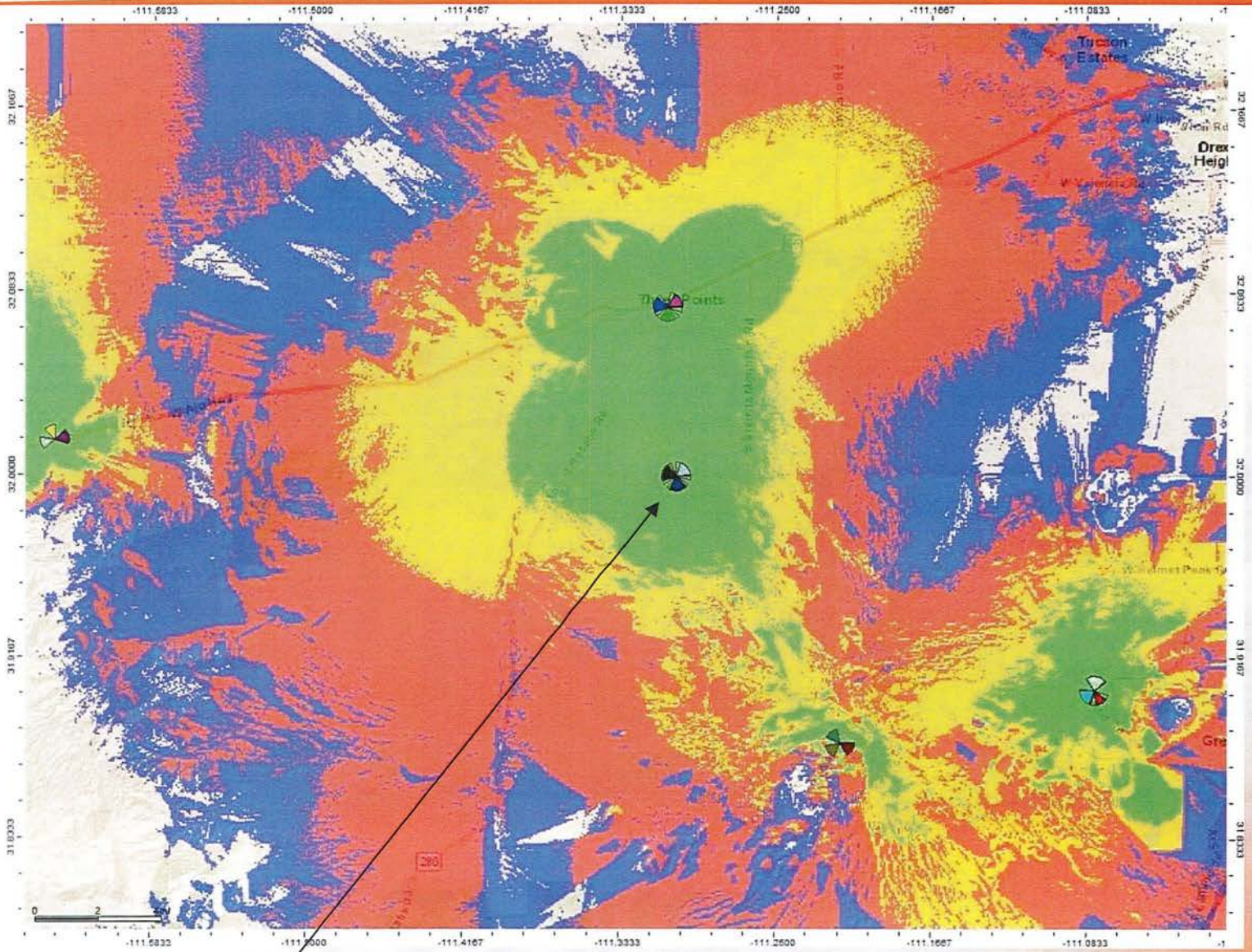
	Outdoor >= -106 dbm
	Marginal >= -115 dbm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31.8333
Tucson Estates
Drex Heigl
Three Points
Wilmot Rd
Glenn Rd
Mission Rd
Wilmot Rd
Sahuarita Road
Nogales Hwy
Tucson Rd
Mission Rd
Wilmot Rd
Sahuarita Rd

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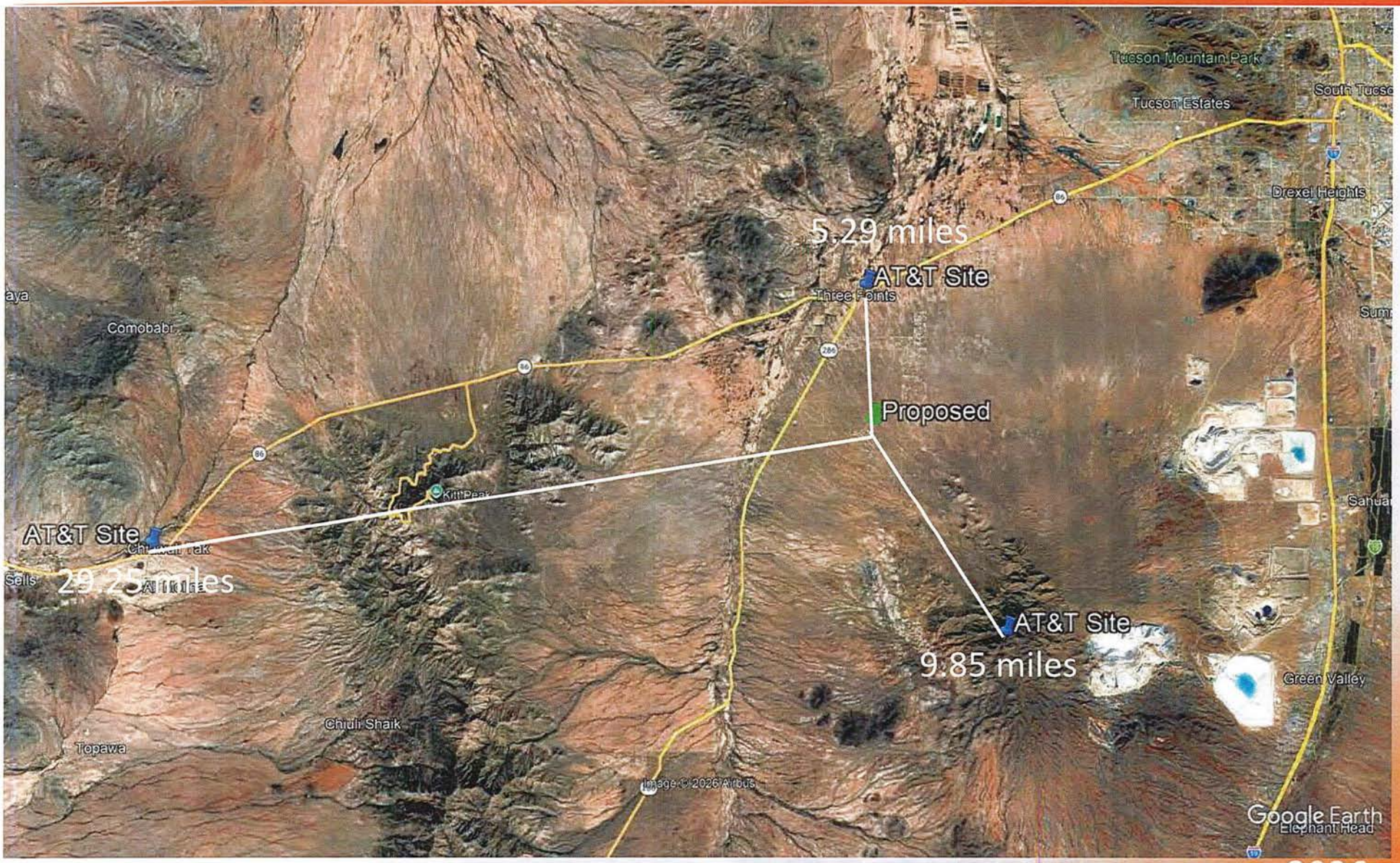
Existing AT&T Sites



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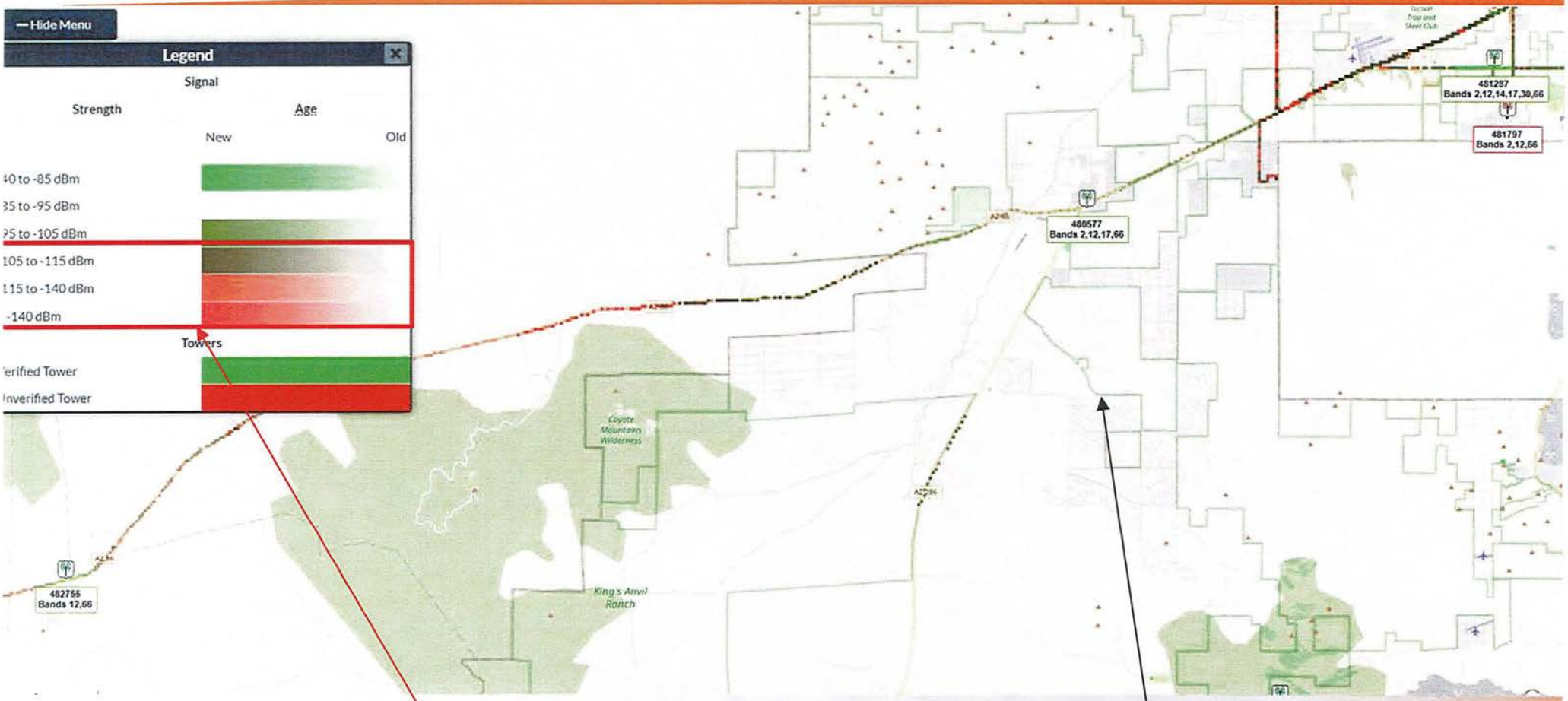
Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

CellMapper Data for AT&T

Source https://cellmapper.net



Poor Service Quality

Proposed Site

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Coverage Map Data for AT&T

Source https://map.coveragemap.com

Proposed Site

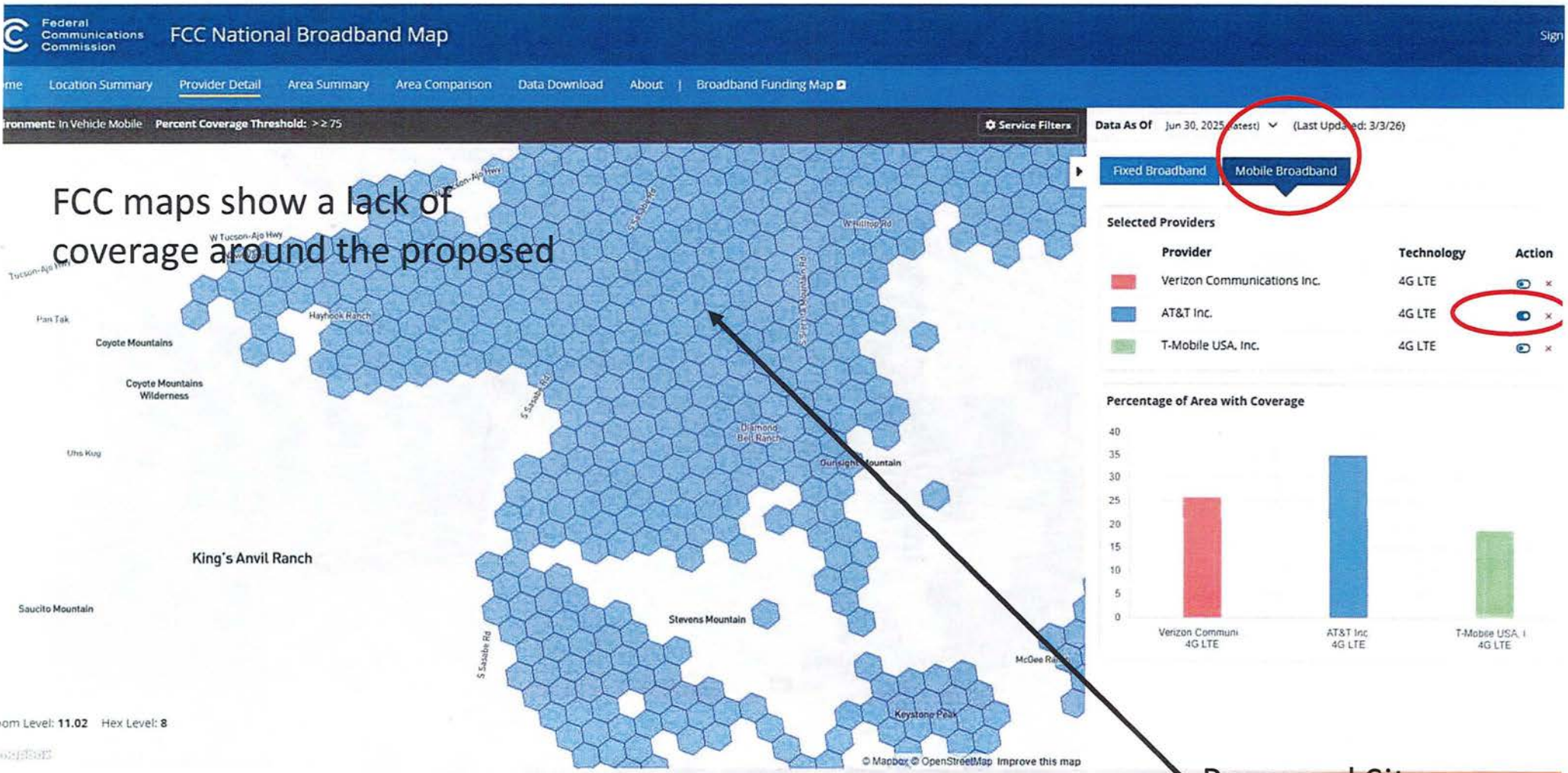
Poor Service Quality

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

FCC Broadband Map
AT&T In-Vehicle Mobile

Source: https://broadbandmap.fcc.gov/home



FCC maps show a lack of coverage around the proposed

Proposed Site

2026

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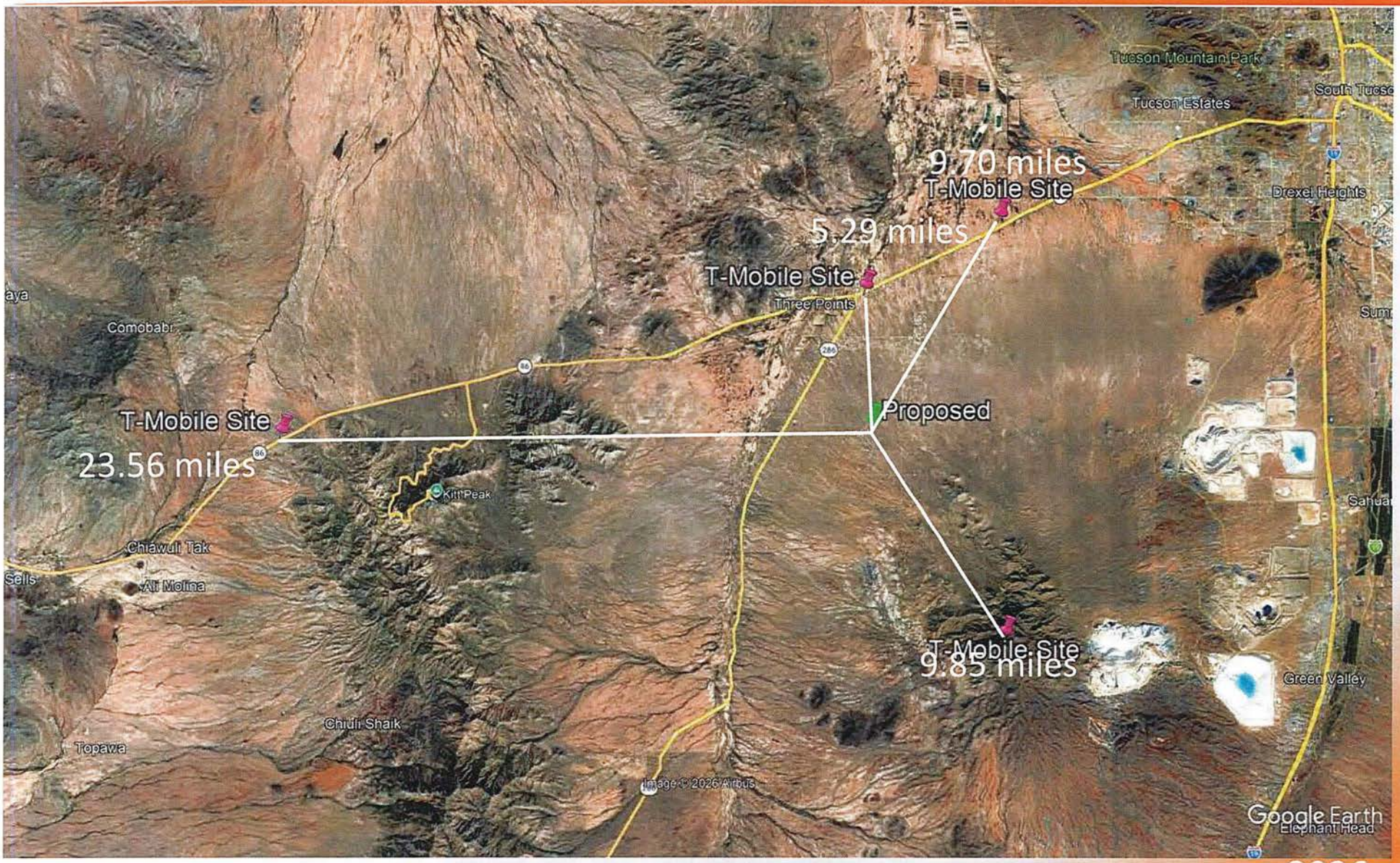
Existing T-Mobile Sites

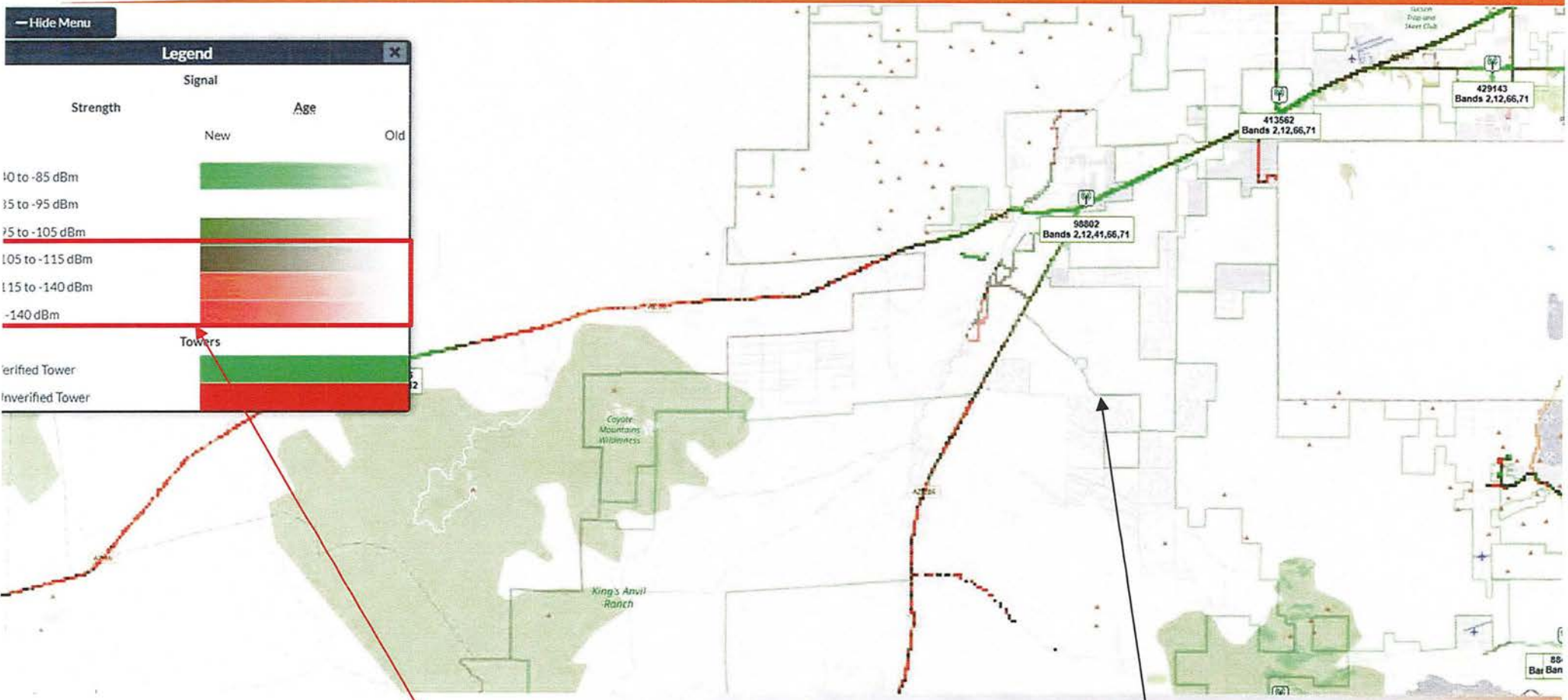


2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

CellMapper Data for T-Mobile

Source https://cellmapper.net



Poor Service Quality

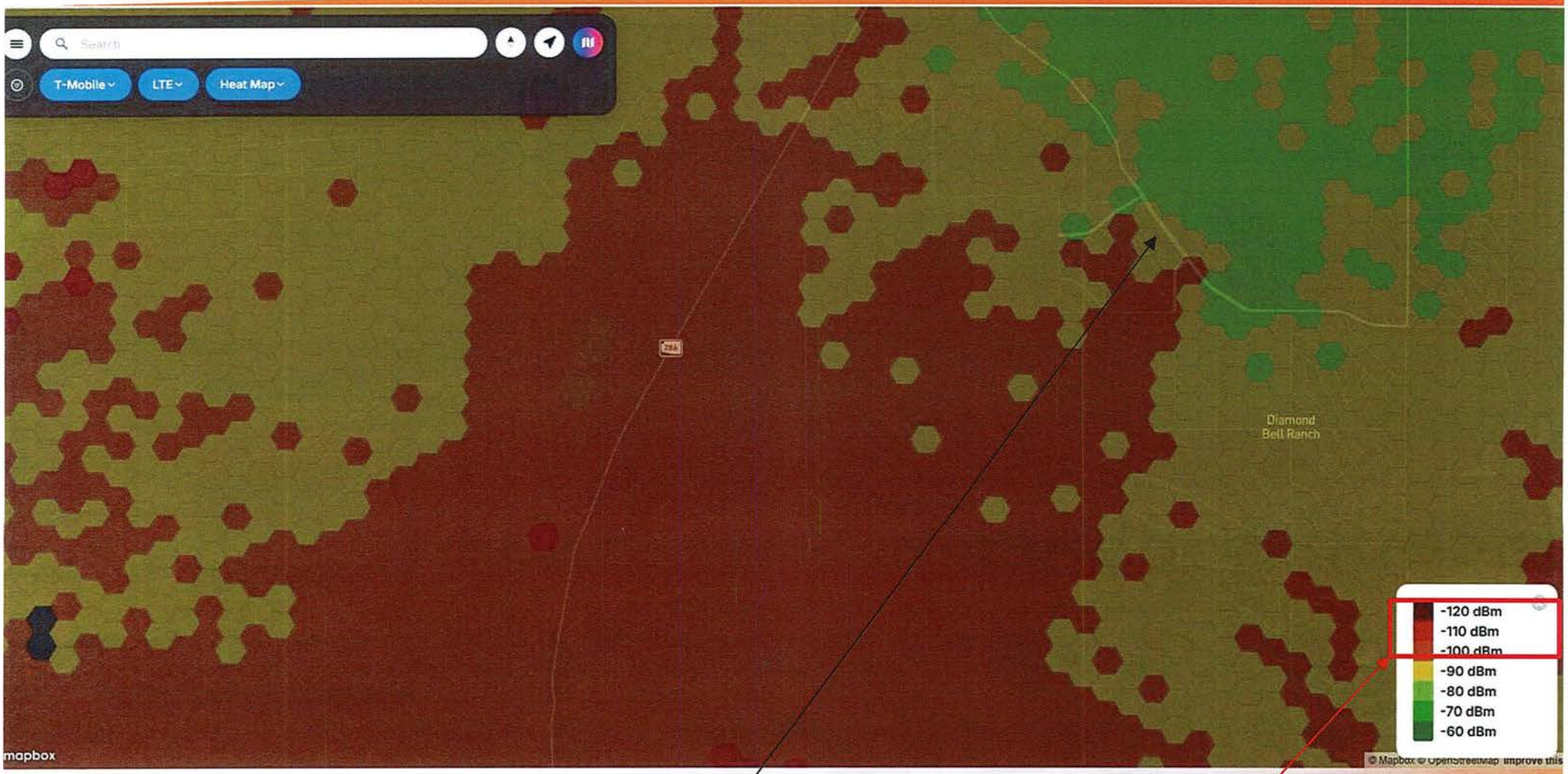
Proposed Site

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Coverage Map Data for T-Mobile

Source https://map.coveragemap.com



Proposed Site

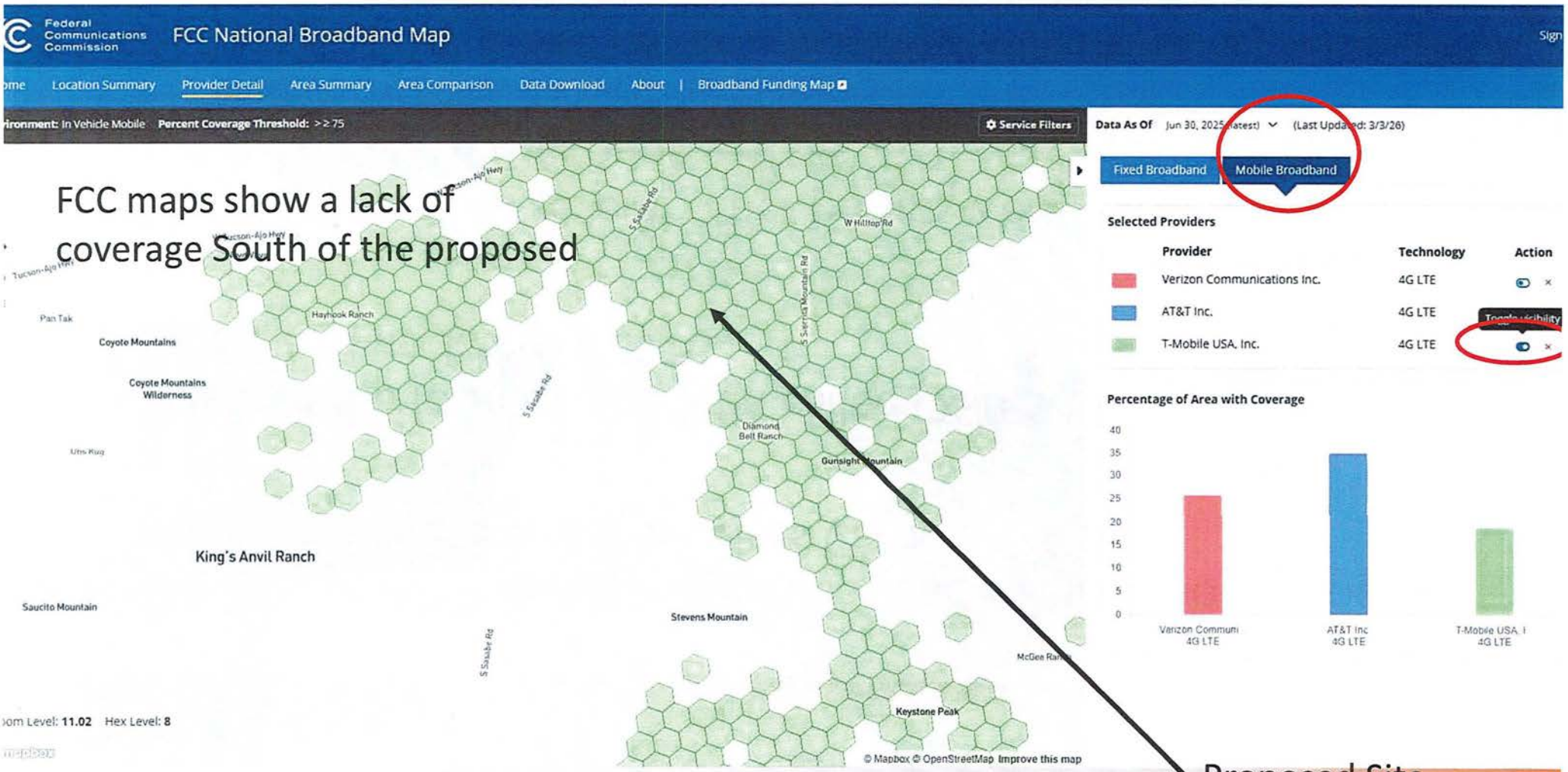
Poor Service Quality

2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

FCC Broadband Map
T-Mobile In-Vehicle Mobile

Source: https://broadbandmap.fcc.gov/home



FCC maps show a lack of coverage South of the proposed

Proposed Site

2026

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Commercial Wireless Carriers RF Safety

- The FCC provides detailed guidance and rules of monitoring and measuring emissions of Wireless Carriers Cell Sites.

- This is in the form of a bulletin called OET65 which was reviewed for 5G and updated in 2019.

- The FCC as well as several other groups were involved in producing OET65. Groups such as:
  - American National Standards Institute (ANSI)
  - Institute of Electrical and Electronics Engineers, Inc. (IEEE)
  - National Council on Radiation Protection and Measurements (NCRP)

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Federal Communications Commission

- The Federal Communications Commission (FCC) is the federal entity that regulates wireless carriers
  - CFR-2002-title 47-volume 1-section 1.1307
    - Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared.
  - CFR-2002-title 47-volume 1-section 1.1310
    - Radio Frequency radiation exposure limits
- The permitting process follows the above regulations when constructing a new wireless tower site.
- Relative to the exposure limits carriers must follow and stay within the standards as regulated by the FCC
- This site meets FCC requirements for emissions and is considered safe to the public
- The FCC does not directly provide documentation on a per site basis as the review is done by a 3rd party Engineering firm.

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General Public & Occupational limits

- **The FCC isolated two (2) groups relative to access around wireless antennas**

- The first group is called Occupational
  - This refers to areas where workers would be allowed (general public cannot access) but the workers would not have knowledge about antennas (An example would be an Air Conditioner Repair Technician). Barriers or signage may be needed to alert the worker when close to the antennas.
    - Examples are:
      - Rooftop access behind a locked door
      - Compound access behind a locked gate
  - The FCC determined the safe value and then lowered by a factor of 10 and that is the value the wireless carriers use in the studies
  - The exposure levels are averaged over 6 minutes

- The second group is called General Public
  - Uncontrolled access (General Public)
    - This group is for areas with general public access, the public would not have a knowledge of an antenna being close to them
    - Examples are:
      - Sidewalks
      - Parks
      - Public accessed buildings
  - The FCC determined the safe value and then lowered by a factor of 50 and that is the value the wireless carriers use in the studies
  - The exposure levels are averaged over 30 minutes

- **Compare the value for a tower which is 1mW to the power of a smartphone which is 200mW of power.**

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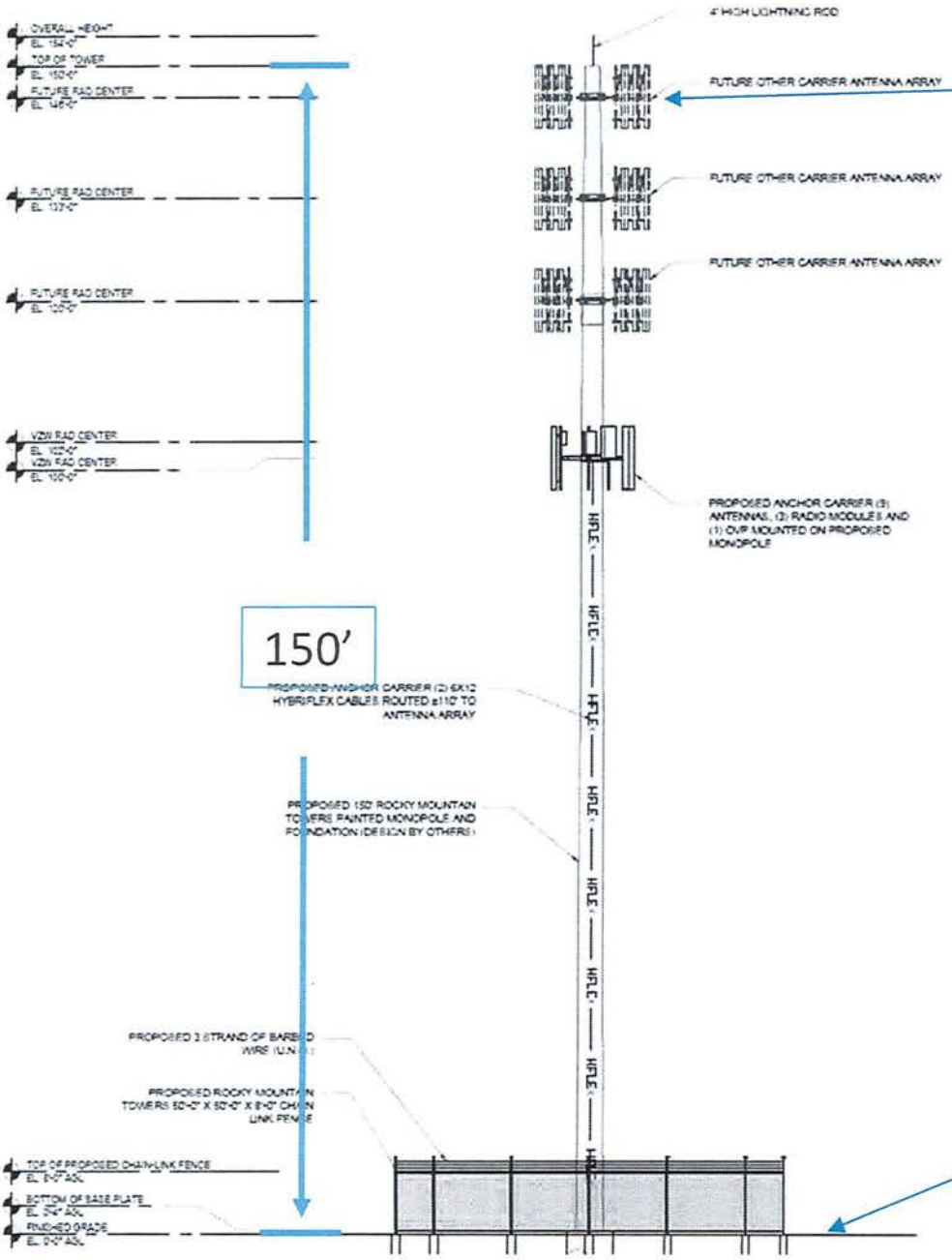
Power Levels below a tower



Main beam of the antenna

- Power levels on the ground around the tower are much less than what is at the antennas
- Power on the ground adjacent to the tower is 1/1000 of the power compared to what is at the antenna

1/1000 of the power on the ground around the site

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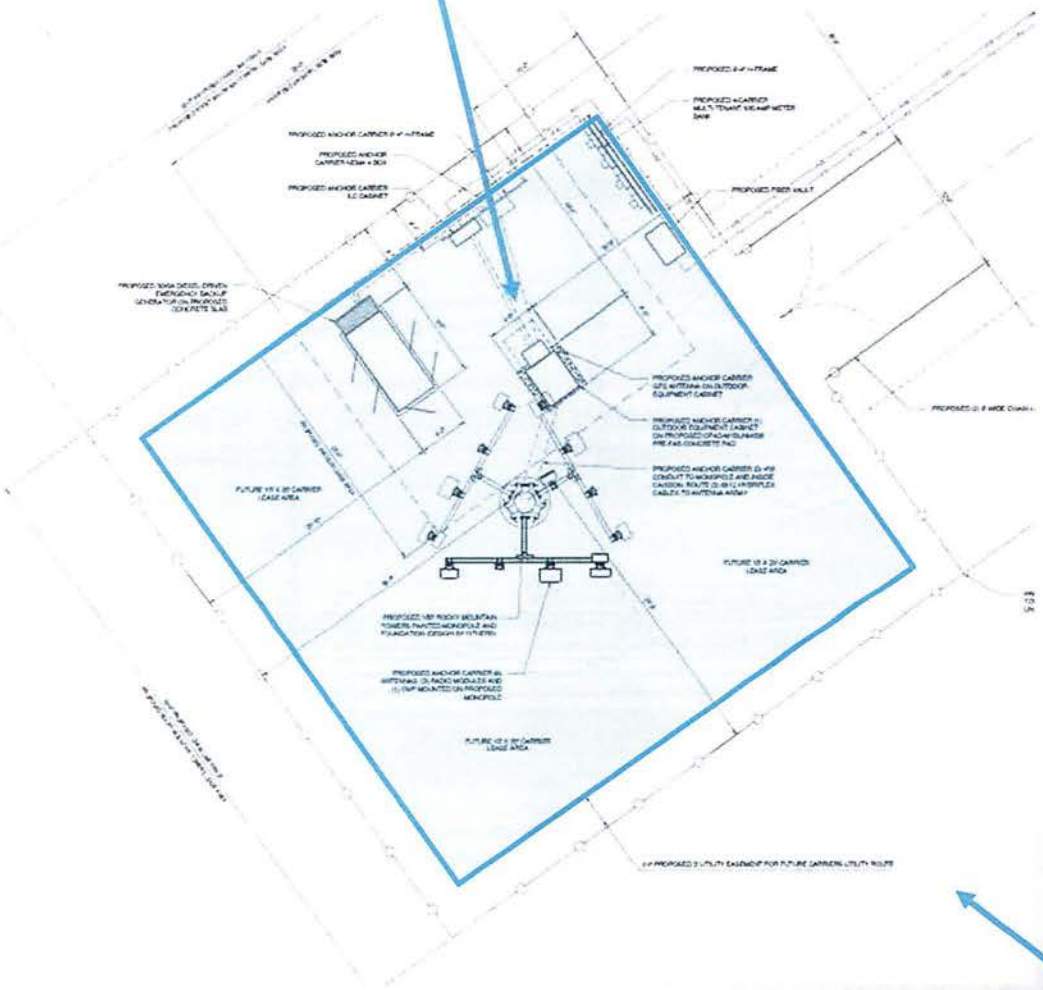
Power Levels around a tower

Occupational



- Next to the tower in the compound in controlled environment (Occupational)
- Outside of the compound and buildings the maximum calculated density is less than 10% of the General Public Standard

General Public

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Frequency Bands / 5G

- There are two (3) types of 5G deployments

- 5G on existing bands in use
  - Carriers have been using these frequency bands already for 4G service
  - 5G technology is being overlaid in place of 4G
  - Just like when 4G replaced 3G or 3G replaced 2G, same concept

- 5G on new bands
  - Carriers have been overlaying this new C-Band frequency block onto existing sites

- Millimeter wave – 28 & 39 GHz
  - These are the frequency bands used on small cells
  - They typically cover only 2 or 3 city blocks
  - Small cells are typically built in Urban or heavy suburban area
  - Small cells are usually placed on right of way light poles

- **Regardless of what band is being used the FCC still regulates all wireless carriers and they must follow the FCC guidelines noted in OET bulletin 65**

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Rocky Mountain Tower Diamond Bell Site

- The safety of Radio Frequency (RF) emissions has been studied for more than 60 years, and the research is under constant review by governments, health agencies, and standard-setting organizations in the U.S. and around the world.
- These organizations have all reached the same general scientific conclusion: there are no established health hazards from exposure to RF emissions that are below the FCC limits.
- All License holders governed by the Federal Communications Commission (FCC) follow the published standard for RF Emissions which is OET 65.
- The Rocky Mountain Tower Diamond Bell site will generate less than 10% of the Federal Maximum permissible Exposure (MPE) General Public Limit.
- For independent studies on RF, visit the websites:
  - American Cancer Society
  - Federal Communications Commission
  - International Commission on Non-Ionizing Radiation Protection
  - World Health Organization

2026

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Analysis

- The area is over capacity and low throughput per user. A capacity cell split is needed
- This area is lacking in throughput per user for Verizon
- This proposed site would provide good service for the customers in area
- Tower is designed to allow for multiple tenants

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Recommendation

- Recommend approval of the proposed at the height requested for Verizon to provide high quality service to the area

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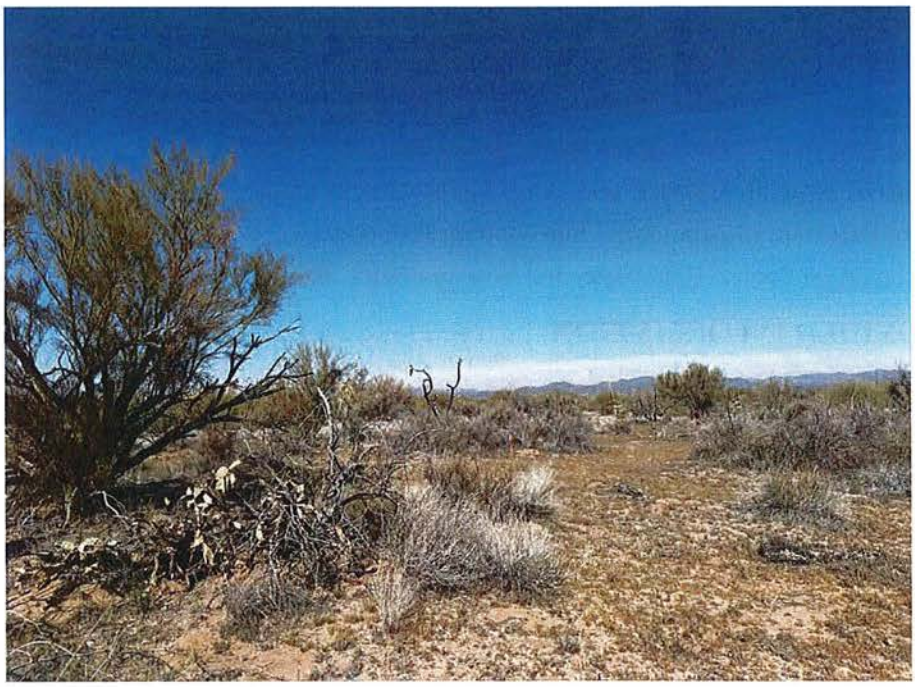
TRILEAF
environmental architecture engineering

Phase I Environmental Site Assessment Report

March 16, 2026



Diamond Bell

Client # 17661693
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736
Trileaf # 783331

Prepared For:
Rocky Mountain Towers, Inc.
5150 Mae Anne Avenue
Reno, Nevada 89523

Prepared By:
Trileaf Corporation
2121 West Chandler Boulevard, Suite 108
Chandler, Arizona 85224

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1.0 EXECUTIVE SUMMARY

This report presents the results of a Phase I Environmental Site Assessment (ESA) conducted by Trileaf Corporation (Trileaf) of a portion of the property owned by Manuel Padilla, Jr. and proposed to be leased by Rocky Mountain Towers, Inc. at 15949 W. Diamond Bell Ranch Road, Arivaca, Pima County, Arizona 85736 (Subject Property). Specifically, the "*Subject Property,*" hereinafter refers to the area that is proposed to be leased or otherwise disturbed by the proposed Rocky Mountain Towers, Inc. installation. The Subject Property and immediate surrounding area were evaluated for this report.

This study was initiated by Rocky Mountain Towers, Inc., hereinafter referred to as "User," to investigate potential environmental concerns at the Subject Property.

The proposed lease area of the Subject Property is currently scrubland, while the proposed access / utility easement is also currently scrubland. The Subject Property is located within the boundaries of a "*parent parcel,*" which refers to County Assessor's Parcel Number (APN) 301-65-4700, totaling approximately 1.14 acres. The parent parcel is generally comprised of scrubland. The Subject Property is located approximately in the center of the parent parcel, approximately 400 feet northeast of a residence.

The proposed Subject Property development includes the construction of a 150-foot-tall monopole telecommunications tower and other associated ground-based equipment within a proposed 50-foot by 50-foot lease area. Access and utilities would be granted via a new proposed 25-foot wide easement. This proposed access / utility easement extends approximately 80 feet northeast from the lease area and further connects to West Diamond Bell Ranch Road.

Subject Property details are as follows:

Table 1.0: Subject Property Details

Parent Parcel Number(s)	301-65-4700
Subject Property/Lease Area Size	2,500 square feet
Existing Compound Size	N/A
Owner	Manuel Padilla, Jr.
Tower Type	Raw-Land New Build

Refer to the site sketches in the Site Plan and Other Maps (Appendix 13.2) for the general layout and location of the proposed lease area and utilities.

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Trileaf has performed a Phase I ESA in conformance with the scope and limitations of ASTM E1527-21 of the Subject Property. Exceptions to, or deletions from, this practice are described in Section 2.4 of this report.

This assessment has revealed no evidence of Recognized Environmental Conditions (RECs) in connection with the Subject Property.

In addition, Trileaf reviewed the site for environmental conditions that are beyond the scope of ASTM E1527-21, and has determined the following:

- No wetlands or state open waters were identified within 300 feet of the Subject Property.
- No lead-based paint, lead-containing paint, or asbestos-containing materials are anticipated to be disturbed as part of the proposed installation.
- No wastewater discharges, drains, ditches, streams, or wells were identified within 300 feet of the Subject Property.

It is the opinion of Trileaf that no further investigation is warranted at this time.

These conclusions are based on the review of available historical information, regulatory records, site reconnaissance and interviews when possible. These conclusions are not subject to environmental concerns or contamination that is hidden, unpublished, or otherwise unknown using standard ASTM E 1527-21 Phase I ESA methodology.

It should be noted that this section is only a brief summary of the findings and does not represent a detailed summary of the information gathered in the preparation of this report. The report should be reviewed in its entirety to fully understand environmental conditions associated with the Subject Property.

2.0 INTRODUCTION

2.1 Purpose

The purpose of this assessment is to identify RECs, including Controlled RECs (CRECs) associated with the Subject Property, establish bona fide prospective purchaser liability protection and contiguous property owner liability protection in relation to the Subject Property. ASTM E1527-21 defines the term "recognized environmental condition" as:

"...(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment..."

ASTM E1527-21 defines the term "controlled recognized environmental condition" as:

"...recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place
subject to implementation of required controls (for example, activity and use limitations or other property use limitations)."

In addition, this assessment summarizes Historical RECs (HRECs) associated with the Subject Property. ASTM E1527-21 defines the term "historical recognized environmental condition" as:

"...a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations)."

ASTM E1527-21 also defines a "*de minimis* condition" as:

"...a condition related to a *release* that generally does not present a threat to human health or the *environment* and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

Finally, ASTM E1527-21 defines the term "business environmental risk" (BER) as:

"...a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice."

2.2 Detailed Scope-of-Services and ASTM Standard Practice E1527-21

On February 11, 2026, Rocky Mountain Towers, Inc. contracted with Trileaf to conduct a standard Phase I ESA for the Subject Property. Trileaf performed the following services:

- Site reconnaissance
- Records review of federal and state databases
- Review of previous environmental reports (when available)
- Interviews (where possible) and review of government records
- Review of historical topographic maps
- Review of historical aerial photographs
- Review of historical Sanborn fire insurance maps (when available)
- Review of city directories (when available)
- Research additional items not covered by ASTM E1527-21

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The most recent U.S. Geological Survey topographic map is included in the Site Vicinity Map (Appendix 13.1). A site plan is also included in the Site Plan and Other Maps (Appendix 13.2).

2.3 Significant Assumptions

It is assumed that the direction of surface water flow in the vicinity of the Subject Property approximates the direction of subsurface shallow groundwater flow in lieu of additional local shallow groundwater information; however, localized geologic characteristics and other subsurface conditions could alter the normally expected shallow groundwater flow direction. In order to more accurately determine the direction of local groundwater flow, subsurface water table measurements would be required.

2.4 Deviations

This Phase I ESA has been subject to the following data gaps, limiting conditions, deviations, deletions and/or exceptions:

- Some historical records reviewed were not readily available in five-year intervals. The first available aerial photograph (dated 1936) depicts the Subject Property as scrubland.

It is Trileaf's opinion that none of the above-mentioned data failures, data gaps, limiting conditions, deviations, deletions and exceptions have significantly affected Trileaf's ability to identify RECs in connection with the Subject Property.

2.5 Limitations and Exceptions

The information presented in this report is compiled from a variety of sources over which Trileaf has neither affiliation nor control. Although these sources are considered reliable, no ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with the Subject Property. Performance of the practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property. This Phase I ESA was done in conformance with ASTM E1527-21.

Based upon this review, Trileaf found no significant data gaps that affected our ability to identify RECs associated with the Subject Property.

2.6 Special Terms and Conditions

This assessment has been conducted in accordance with ASTM E1527-21. There were no special terms or conditions involved with this assessment.

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2.7 User Reliance

This report may be relied upon by Rocky Mountain Towers, Inc. only. Reliance on this document by any other party is forbidden without the express written consent of Trileaf in the form of a signed Reliance Letter and that party's acceptance of mutually agreeable terms and conditions. Use of this report for purposes beyond those reasonably intended by Rocky Mountain Towers, Inc. and Trileaf will be at the sole risk of the unintended user.

This report is based on the best current available information and prepared in accordance with generally accepted practices in the field of environmental consulting. Trileaf is not responsible for independent conclusions or recommendations made by others based on the data presented in this report.

3.0 SITE DESCRIPTION

3.1 Subject Property Location and Legal Description

The Subject Property consists of a 2,500-square-foot proposed lease area, as well as an approximately 80-foot long proposed access/utility easement extending northeast from the lease area. The proposed lease area of the Subject Property is located in the center of the parent parcel.

The parent parcel is located in the southeast quarter of Section 34, Township 16, and Range 10 of Pima County, Arizona. The parent parcel itself consists of scrubland.

The following table summarizes the location and legal description of the Subject Property.

Table 3.1: Location and Legal Description	
Parent Parcel Number(s)	301-65-4700
Parent Parcel Acreage	1.14 acres
Subject Property/Lease Area Size	2,500 square feet
Land Use of Parent Parcel	Scrubland
Address	15949 W. Diamond Bell Ranch Road
City, State	Arivaca, Arizona
County	Pima
Zip	85736

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Table 3.1: Location and Legal Description	
Site Coordinates of Proposed Lease Area	31.999883° North latitude 111.30335° West longitude

The Subject Property location is indicated on a Site Vicinity Map included in Appendix 13.1 and a site plan is included in Appendix 13.2. A full legal description of the parent parcel can be found in the Title Report located in Appendix 13.9.

3.2 Site and Vicinity General Characteristics

Table 3.2: Site and Vicinity General Characteristics	
Proposed Lease Area Description	The proposed lease area of the Subject Property is currently scrubland.
Subject Property Location Type	Rural
Current Subject Property Use	The proposed lease area of the Subject Property is currently scrubland, while the proposed access / utility easement is also currently scrubland.
General Surrounding Property Characteristics	Scrubland to the north and south, Diamond Bell Ranch Road and scrubland to the east, and residences and scrubland to the west.
Elevation	3,142 feet Above Mean Sea Level (AMSL)

3.3 Current and Past Uses of the Subject Property

The parent parcel of the Subject Property is currently utilized by Manuel Padilla, Jr.. The Subject Property itself currently consists of undeveloped scrubland.

The past use of the Subject Property has historically consisted of scrubland, since approximately 1936.

3.4 Descriptions of Structures, Roads, and Other Improvements on the Subject Property

The following table provides information on improvements present on the Subject Property at the time of the site reconnaissance.

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Table 3.4: Summary of Subject Property Improvements		
Item	**Observed on the Subject Property**	**Comments**
Structures	No	
Heating/Cooling System	No	
Potable Water Source	No	
Sewage Disposal System	No	
Drainage Control Measures	No	
Roads	No	
Other Improvements (specify)	No	

Trileaf did not observe additional potentially adverse environmental conditions associated with the adjoining properties during the site walkover.

3.5 Current and Past Uses of Adjoining / Surrounding Properties

Table 3.5: Summary of Adjoining Property Use		
Direction	**Current Use(s)**	**Past Use(s)**
North	West Diamond Bell Ranch Road, followed by scrubland	Scrubland
East	Scrubland	Scrubland
South	Scrubland, followed by the Soto Wash, followed by residences	Scrubland
West	Scrubland, followed by West Larkdale Street	Scrubland

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3.6 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

The EDR GeoCheck Physical Setting Source (PSS) Addendum, contained within the radius search report, was used as the primary source for the following information. Other maps, including but not limited to regional topographical maps, geological maps, and U.S. Geological Survey well maps, were also reviewed.

Table 3.6: Geologic, Hydrologic, and Topographic Conditions

Item	Description
Lithology (Soils)	
Source	U.S. Department of Agriculture Soil Conservation Service
Soil Type(s)	The Subject Property is underlain by Hayhook sandy loam soil
Infiltration Rate	Moderate infiltration
Drainage	Well drained
Soil Profile	A typical profile of a Hayhook soil consists of sandy loam in two (2) distinct layers from zero (0) to five (5) inches and from 5 to 24 inches, then gravelly sandy loam in two (2) distinct layers from 24 to 38 inches, and from 38 to 59 inches.
Geology	
Geologic Sources(s)	*Richard, S.M., Reynolds, S.J., Spencer, J.E., and Pearthree, P.A., 2000, Geologic Map of Arizona: Arizona Geological Survey Map 35, 1 sheet, scale 1:1,000,000.*
Geologic Description	Based on a review of *Richard, S.M., Reynolds, S.J., Spencer, J.E., and Pearthree, P.A., 2000, Geologic Map of Arizona: Arizona Geological Survey Map 35, 1 sheet, scale 1:1,000,000.* the Subject Property is underlain by the Pliocene to middle Miocene deposits of the Pliocene and Miocene epochs, consisting primarily of conglomerate and sandstone, with minor traces of gypsum, siltstone, mudstone, and limestone.
Hydrology	
Hydrologic Source(s)	EDR PSS Addendum Map Arizona Department of Water Resources
On-Property Water Bodies	None

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Table 3.6: Geologic, Hydrologic, and Topographic Conditions	
Item	**Description**
Off-Property Water Bodies	The nearest water body is the Soto Wash stream, located approximately 315 feet southwest of the proposed lease area.
Presumed Groundwater Flow Direction	Local topography and surface water drainage suggests that the direction of shallow groundwater flow beneath the Subject Property is to the north. In order to more accurately determine the direction of local shallow groundwater flow, groundwater potentiometric surface measurements would be required.
Groundwater Wells	According to EDR PSS Addendum map, there are four (4) water wells located within one half (0.5) mile of the Subject Property. Information obtained from the Arizona Department of Water Resources for wells in this area suggests that the depth to shallow groundwater is approximately 44 feet below ground.
Topographic Conditions	
Topographic Source(s)	7.5-minute U.S. Geological Survey Topographic Map Stevens Mountain, Arizona Quadrangle, dated 2021.
Subject Property Elevation	Approximately 3,142 feet AMSL
Subject Property Setting	Rural
Topography	Generally flat
Surface Water Runoff	North

4.0 USER PROVIDED INFORMATION

The following sections summarize pertinent information provided to Trileaf by the User.

4.1 User Questionnaire

Trileaf reviewed the All Appropriate Inquiries (AAI) User Questionnaire prepared by Ms. Sarah Neace. Based upon this review, Ms. Sarah Neace had no specialized knowledge of environmental clean-up liens or activity and use limitations. In addition, Ms. Sarah Neace had no knowledge pertaining to the storage of chemicals, spills, environmental clean-ups, or contamination that might have resulted in the degradation of the environmental quality of the Subject Property. A copy of the AAI User Questionnaire is provided in the User Questionnaire (Appendix 13.8).

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4.2 Title Records and Environmental Liens

Trileaf reviewed a Report of Title document, prepared by U.S. Title Solutions, and dated December 24, 2026, provided by the User. Based upon the information reviewed by Trileaf, the Subject Property is currently owned by Manuel Padilla, Jr.. Trileaf also reviewed previous owners indicated within the title documents and found none that may represent a potential REC.

4.3 Activity and Use Limitations

Trileaf has reviewed the title documents provided by the User, referenced in Section 4.2 above, and has found no evidence of environmental liens or activity and use limitations.

4.4 Specialized Knowledge

The User reported no Specialized Knowledge or experience material to RECs in connection with the Subject Property; actual knowledge of valuation reduction associated with environmental issues for the Subject Property; or commonly known reasonably ascertainable information within the local community about the Subject Property that is material to RECs in connection with the Subject Property. ASTM Standard E 1527-21 defines the term "reasonably ascertainable" as "*information that is: (1) publicly available; (2) obtainable from its source within reasonable time and cost constraints; and (3) practically reviewable.*"

4.5 Owner, Subject Property Manager, and Occupant Information

The Subject Property is currently owned by Manuel Padilla, Jr. and is proposed to be leased by Rocky Mountain Towers, Inc.. There are no reported occupants or property managers associated with the Subject Property.

4.6 Proposed Site Design Drawings

See Section 4.7 below and Appendix 13.2 for a description and drawings depicting the proposed Rocky Mountain Towers, Inc. installation.

4.7 Proposed Structure Information, Including Proposed Height and Foundation Depth

The proposed Subject Property development includes the construction of a 150-foot-tall monopole telecommunications tower and other associated ground-based equipment within a proposed 50-foot by 50-foot lease area. Access and utilities would be granted via a new proposed 25-foot wide easement. This proposed access / utility easement extends approximately 80 feet northeast from the lease area and further connects to West Diamond Bell Ranch Road. The proposed foundation depth was not reported to Trileaf.

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4.8 Other

No previous environmental reports concerning the Subject Property were made available to Trileaf.

5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

The site reconnaissance included a walkover and examination of the Subject Property and the adjacent properties. Observations of the Subject Property and the adjoining properties were made from within the Subject Property boundaries, and photographs were taken. Photographic documentation is included in the Site Photographs (Appendix 13.3).

Table 5.1: Methodology and Limiting Conditions	
Date of Site Visit:	March 2, 2026
Personnel:	Ms. Sophia Dixon and Ms. Evelyn Bell
Escort(s):	Mr. Manuel Padilla
Limiting Conditions:	None

5.2 General Site Setting

A summary of the General Site Setting is provided in the table below.

Table 5.2: General Site Setting	
Subject Property Size	2,500 square feet
Feet Above Mean Sea Level	3,142
Area Use	Rural
Site County	Pima
Site State	Arizona
Topography	The Subject Property is located on relatively flat land with no creeks, ravines, or ditches noted nearby. No bedrock outcrops or sinkholes were noted in the area.

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Table 5.2.1 Site Reconnaissance Summary

Feature	Observed on or near Subject Property	Comment(s) in Section	Environmental Concern
Buried Debris, Debris/Soil Piles, Evidence of Dumping, and/or Fill Material	No	-	No
Detention or Retention Basins, Stormwater Drains, or Other Stormwater / Water Features	No	-	No
Drains (other than municipal sanitary waste drains such as sinks, showers, and toilets)	No	-	No
Drums and Chemical Containers (capacity 5 to 55 gallons)	No	-	No
Generation, Storage, and/or Disposal of Hazardous Waste (including waste oil and batteries)	No	-	No
Heating and Cooling Systems	No	-	No
High-Voltage Electrical Transmission Lines	No	-	No
Interceptors and/or Separators (including OWS)	No	-	No
On-Site Records	No	-	No
Pools, Pits, Cisterns, Sumps, Vaults, or Similar Receptacles Where Liquids Drain, Collect or are Stored, and Pooled Liquids	No	-	No
Septic Systems	No	-	No
Stained Surfaces and/or Stressed Vegetation	No	-	No
Sources of Polychlorinated Biphenyls (PCBs)	No	-	No
Storage Tanks (USTs, ASTs, or totes)	No	-	No
Unidentified Substances	No	-	No
Wastewater (excluding sanitary wastes)	No	-	No

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Table 5.2.1 Site Reconnaissance Summary			
Feature	**Observed on or near Subject Property**	**Comment(s) in Section**	**Environmental Concern**
Wells (potable, monitoring, observation, or dry)	No	-	No
Other Improvements, Features, or Environmental Concerns	No	-	No

No obvious signs of environmental concerns (monitoring wells, soil staining, stressed vegetation, odors, pools of liquid, and other signs of potential environmental concerns) were noted on the Subject Property or on the adjoining properties.

5.3 Exterior Observations

The lease area of the Subject Property consisted of scrubland. The proposed access / utility easement extended northeast from the lease area, also through scrubland, and further extended to West Diamond Bell Ranch Road.

5.3.1 Utilities

The Subject Property currently consists of an un-utilized portion of the parcel and is therefore served by no utilities. However, the parent parcel is served by public electrical utilities. No potable water wells were observed on the Subject Property.

5.3.2 Waste Generation

No evidence of hazardous waste generation was observed during site reconnaissance.

5.3.3 Storage Tanks and Use

The Subject Property was inspected for visual evidence of both aboveground and underground storage tanks, including vent pipes, fill pipes, and manways.

No evidence of storage tanks was noted during the site inspection.

5.3.4 Chemical Use and Storage

No chemicals were observed on the Subject Property.

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5.3.5 Toxic Substances Control Act – Polychlorinated Biphenyls and other Substances

Historically, PCBs, a group of hazardous substances and suspected human carcinogens, were widely used as an additive in cooling oils for electrical components. Typical sources of PCBs can include elevators and hydraulic equipment.

No potential PCB sources (i.e., transformers and hydraulic equipment) were observed on the Subject Property.

5.3.6 Other Concerns / Emerging Contaminants

As defined in 3.2.36 of the ASTM Phase I practice, *hazardous substance* means "those substances defined as a *hazardous substance* pursuant to CERCLA 42 U.S.C. § 9601(14), as interpreted by EPA regulations and the courts." There are some substances that non-*environmental professionals* and others may assume to be *hazardous substances* that are not defined (or not yet defined) as *hazardous substances* under CERCLA through interpretation by EPA regulations and the courts. These substances may include: *(1)* some substances that occur naturally or through biological digestion (for example, methane), and *(2)* substances about which human understanding is evolving (for example, per- and polyfluoroalkyl substances, also known as "PFAS"). These and any other "emerging contaminants," where they are not identified as a *hazardous substance* by CERCLA, as interpreted by EPA regulations and the courts, are not included in the scope of this practice. Some of these substances may be considered a *"hazardous substance"* (or equivalent) under applicable state laws. In those instances, where a *Phase I Environmental Site Assessment* is performed to satisfy both federal and state requirements, or as directed by the *user* of the *report*, it is permissible to include analysis and/or discussion of these substances in the same manner as any other Non-Scope Consideration. If and when such emerging contaminants are defined to be a *hazardous substance* under CERCLA, as interpreted by EPA regulations and the courts, such substances shall be evaluated within the scope of this practice.

Trileaf did not identify any emerging contaminants as potential concerns during the course of this assessment.

No other concerns were noted during the site inspection.

5.4 Interior Observations

There were no buildings on the Subject Property, therefore no interior observations were required.

5.5 Asbestos

The use of Asbestos Containing Material (ACM) was curtailed after the United States Environmental Protection Agency (EPA) began to consider regulating the commercial uses of asbestos in 1979. ACM was officially banned in 1989; however, in 1991, the courts overturned the majority of the ban. Therefore, ACM is still legal and utilized in many applications. Building materials that are Suspect Asbestos-Containing

Materials (Suspect ACM) are divided into three categories: surfacing materials that are sprayed or troweled on for acoustical, decorative, or fireproofing purposes (examples include textured ceilings or drywall, exterior stucco and structural steel fireproofing); Thermal System Insulation (TSI) used to inhibit heat transfer from pipes, boilers, tanks, ducts, and various other components of hot and cold water systems and HVAC systems (examples include hard cementitious "mud" type insulation on pipes, boilers and flues); and miscellaneous materials consisting mostly of non-friable products and materials such as floor tile, drywall, ceiling tile and roofing felt.

As there are no structures on the Subject Property, no suspect ACMs are anticipated to be disturbed as part of the proposed wireless installation.

5.6 Lead-Based Paint

The EPA defines "lead-based paint" (LBP) as paint containing equal-to or greater-than one milligram per square centimeter or 0.5% by weight of lead (5,000 parts-per-million). The EPA banned the use of LBP in target housing and child-occupied facilities in 1978; however, LBP is still utilized in other applications. According to 41 CFR 101-42.001, Lead-Containing Paint (LCP) is defined as paint or other similar surface coating material that contains lead or lead compounds in excess of 0.06 percent of the weight of the total nonvolatile content of the paint or the weight of the dried paint film. However, it should be noted that for all tasks governed by OSHA's Lead in Construction Standard (29 CFR 1926.62), if a paint contains any level of lead, employers must comply with the assessment measures and any applicable protections of that standard.

As there are no painted structures on the Subject Property, no LBP or LCP is anticipated to be disturbed as part of the proposed installation.

5.7 Mold

As there are no structures on the Subject Property, any mold on the Subject Property is the result of natural, ambient levels.

6.0 INTERVIEWS

Trileaf conducted and/or attempted to conduct the following interviews in relation to the Subject Property.

Table 6.0: Summary of Interviews

Title	Contact	Contact Information	Date(s) Contacted	Response Received?
Owner(s)	Manuel Padilla, Jr.	**Phone:** (520) 490-1147	March 9, 2026	Yes

Table 6.0: Summary of Interviews				
Title	**Contact**	**Contact Information**	**Date(s) Contacted**	**Response Received?**
Local Government Officials	Arizona Department of Environmental Quality (AZDEQ)	**Webform:** https://my.azdeq.gov/mydeq-recordscenter/records-request	February 26, 2026	No
	Pima County, Arizona - Office of Emergency Management (Pima County OEM)	**Webform:** https://pima-oem.app.transform.civicplus.com/forms/32913	February 26, 2026	No

6.1 Interview with Owner(s)

According to the Pima County Assessor, the Subject Property is owned by Manuel Padilla, Jr. and Mr. Padilla identified themselves as the current owner representative. Mr. Padilla indicated the Subject Property is currently unimproved and unutilized scrubland, and was unimproved and unutilized prior to his purchase in 2022.

Mr. Padilla was unaware of previous environmental site assessment reports, tanks, chemical storage, fill material, notices or other correspondence from government agencies relating to past or current violations of environmental laws, hazardous waste generator notices or reports associated with the Subject Property.

Mr. Padilla also had no knowledge of pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Subject Property, or notices from any governmental entity regarding possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

The Subject Property owner was forthcoming with information.

The contact information for Manuel Padilla, Jr. is included in the Interviews and Records Requests (Appendix 13.6).

6.2 Interview with Neighbors

No neighbors were interviewed for the purpose of this report.

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6.3 Interviews with Local Government Officials and Records Requests

On February 26, 2026, Trileaf sent a Freedom of Information Act (FOIA) request to the AZDEQ and the Pima County OEM, requesting records of potential environmental concern related to the address affiliated with the Subject Property.

At the time of this report, neither the AZDEQ nor the Pima County OEM have responded to Trileaf's FOIA requests. Should pertinent information be provided to Trileaf, subsequent to the submission of this report, an addendum will be drafted.

7.0 RECORDS REVIEW

7.1 Environmental Records Sources per Scope of Work

Trileaf reviewed an environmental database search dated March 10, 2026. The environmental database search meets the government records search requirements of ASTM E1527-21 for Environmental Site Assessments. The relevant portions of the search will be summarized in this section. A table of the total number of sites in each respective category can be found in the report in the Regulatory Records Documentation (Appendix 13.5).

Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
NPL	1.000	0	0	0	0	0	0
Proposed NPL	1.000	0	0	0	0	0	0
NPL LIENS	0	0	NR	NR	NR	NR	0
Delisted NPL	1.000	0	0	0	0	0	0
FEDERAL FACILIT Y	0.500	0	0	0	0	NR	0
SEMS	0.500	0	0	0	0	NR	0
SEMS-AR CHIVE	0.500	0	0	0	0	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
CORRACTS	1.000	0	0	0	0	0	0
RCRA-TSDF	0.500	0	0	0	0	NR	0
RCRA-LQG	0.250	0	0	0	NR	NR	0
RCRA-SQG	0.250	0	0	0	NR	NR	0
RCRA-VSQG	0.250	0	0	0	NR	NR	0
LUCIS	0.500	0	0	0	0	NR	0
US ENG CONTROLS	0.500	0	0	0	0	NR	0
US INST CONTROLS	0.500	0	0	0	0	NR	0
ERNS	0.250	0	0	0	NR	NR	0
AZ NPL	1.000	0	0	0	0	0	0
AZ WQARF	1.000	0	0	0	0	0	0
SPL	1.000	0	0	0	0	0	0
SHWS	1.000	0	0	0	0	0	0
SWF/LF	0.500	0	0	0	0	NR	0
LUST	0.500	0	0	0	0	NR	0
INDIAN LUST	0.500	0	0	0	0	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
FEMA UST	0.250	0	0	0	NR	NR	0
UST	0.250	0	0	0	NR	NR	0
AST	0.250	0	0	0	NR	NR	0
INDIAN UST	0.250	0	0	0	NR	NR	0
AZURITE	0.500	0	0	0	0	NR	0
AUL	0.500	0	0	0	0	NR	0
INDIAN VCP	0.500	0	0	0	0	NR	0
VCP	0.500	0	0	0	0	NR	0
BROWNFIELDS	0.500	0	0	0	0	NR	0
US BROWNFIELDS	0.500	0	0	0	0	NR	0
SWTIRE	0.500	0	0	0	0	NR	0
INDIAN ODI	0.500	0	0	0	0	NR	0
DEBRIS REGION 9	0.500	0	0	0	0	NR	0
ODI	0.500	0	0	0	0	NR	0
IHS OPEN DUMPS	0.500	0	0	0	0	NR	0
US HIST CDL	0	0	NR	NR	NR	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
CDL	0	0	NR	NR	NR	NR	0
US CDL	0	0	NR	NR	NR	NR	0
LIENS 2	0	0	NR	NR	NR	NR	0
HMIRS	0	0	NR	NR	NR	NR	0
SPILLS	0.500	0	0	0	0	NR	0
SPILLS 90	0.500	0	0	0	0	NR	0
RCRA NonGen / NLR	0	0	NR	NR	NR	NR	0
FUDS	1.000	0	0	0	0	0	0
DOD	1.000	0	0	0	0	0	0
SCRD DRYCLE ANERS	0.500	0	0	0	0	NR	0
US FIN ASSUR	0	0	NR	NR	NR	NR	0
EPA WATCH LIST	0	0	NR	NR	NR	NR	0
2020 COR ACTION	0.250	0	0	0	NR	NR	0
TSCA	0.250	0	0	0	NR	NR	0
TRIS	0.250	0	0	0	NR	NR	0
SSTS	0	0	NR	NR	NR	NR	0
ROD	1.000	0	0	0	0	0	0
RMP	0	0	NR	NR	NR	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
RAATS	0	0	NR	NR	NR	NR	0
PRP	0	0	NR	NR	NR	NR	0
PADS	0	0	NR	NR	NR	NR	0
ICIS	0	0	NR	NR	NR	NR	0
FTTS	0.250	0	0	0	NR	NR	0
MLTS	0.250	0	0	0	NR	NR	0
COAL ASH DOE	0	0	NR	NR	NR	NR	0
COAL ASH EPA	0.500	0	0	0	0	NR	0
PCB TRANSF ORMER	0	0	NR	NR	NR	NR	0
RADINFO	0	0	NR	NR	NR	NR	0
HIST FTTS	0	0	NR	NR	NR	NR	0
DOT OPS	0	0	NR	NR	NR	NR	0
CONSEN T	1.000	0	0	0	0	0	0
INDIAN RESERV	1.000	0	0	0	0	0	0
FUSRAP	1.000	0	0	0	0	0	0
UMTRA	0.500	0	0	0	0	NR	0
LEAD SMELTE RS	0	0	NR	NR	NR	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
US AIRS	0	0	NR	NR	NR	NR	0
US MINES	0.250	0	0	0	NR	NR	0
MINES MRDS	0	0	NR	NR	NR	NR	0
ABANDONED MINES	0.500	0	0	0	0	NR	0
FINDS	0.250	0	0	0	NR	NR	0
ECHO	0	0	NR	NR	NR	NR	0
UXO	1.000	0	0	0	0	0	0
DOCKET HWC	0	0	NR	NR	NR	NR	0
FUELS PROGRAM	0.250	0	0	0	NR	NR	0
PFAS NPL	0.500	0	0	0	0	NR	0
PFAS FEDERAL SITES	0.500	0	0	0	0	NR	0
PFAS TSCA	0.500	0	0	0	0	NR	0
PFAS TRIS	0.500	0	0	0	0	NR	0
PFAS RCRA MANIFEST	0.500	0	0	0	0	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
PFAS ATSDR	0.500	0	0	0	0	NR	0
PFAS WQP	0.500	0	0	0	0	NR	0
PFAS NPDES	0.500	0	0	0	0	NR	0
PFAS PROJECT	0.500	0	0	0	0	NR	0
PFAS ECHO	0.500	0	0	0	0	NR	0
PFAS ECHO FIRE TRAIN	0.500	0	0	0	0	NR	0
PFAS PT 139 AIRPORT	0.500	0	0	0	0	NR	0
AQUEOUS FOAM NRC	0.250	0	0	0	NR	NR	0
BIOSOLIDS	0	0	NR	NR	NR	NR	0
UST FINDER	0.250	0	0	0	NR	NR	0
UST FINDER RELEASE	0.500	0	0	0	0	NR	0
E MANIFEST	0.250	0	0	0	NR	NR	0
PFAS	0.500	0	0	0	0	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
AQUEOUS FOAM	0.250	0	0	0	NR	NR	0
AIRS	0	0	NR	NR	NR	NR	0
Aquifer	0	0	NR	NR	NR	NR	0
AZ DOD	0.500	0	0	0	0	NR	0
Dry Wells	0	0	NR	NR	NR	NR	0
DRYCLEANERS	0.250	0	0	0	NR	NR	0
EMAP	0	0	NR	NR	NR	NR	0
Enforcement	0	0	NR	NR	NR	NR	0
Financial Assurance	0	0	NR	NR	NR	NR	0
MANIFEST	0.250	0	0	0	NR	NR	0
SPDES	0	0	NR	NR	NR	NR	0
VAPOR	0.500	0	0	0	0	NR	0
UIC	0	0	NR	NR	NR	NR	0
WWFAC	0.500	0	0	0	0	NR	0
DRYWELLS HIST	0	0	NR	NR	NR	NR	0
EDR MGP	1.000	0	0	0	0	0	0
EDR Hist Auto	0.125	0	0	NR	NR	NR	0
EDR Hist Cleaner	0.125	0	0	NR	NR	NR	0

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Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
RGA HWS	0	0	NR	NR	NR	NR	0
RGA LF	0	0	NR	NR	NR	NR	0
RGA LUST	0	0	NR	NR	NR	NR	0

The Subject Property was not listed in any of the databases referenced by the environmental database search report.

No sites were mapped within the respective search radii.

7.1.1 Orphan Sites

In addition, Trileaf reviewed the list of "orphan" sites – sites that were unable to be mapped and found that no orphan sites were identified in the regulatory records.

7.2 Deviations

Trileaf has encountered no deviations from ASTM E1527-21 with regard to environmental records or environmental records sources, except for those mentioned in Section 2.4.

7.3 Additional Environmental Record Sources

Neither the Subject Property nor adjacent parcels were listed in the regulatory records; therefore, it is the opinion of Trileaf that an in-person regulatory file review is unnecessary for the purpose of this assessment.

On March 10, 2026, Trileaf searched the AZDEQ - Database Search Page for information regarding the Subject Property and surrounding area and found no records which pose an environmental concern to the Subject Property based upon their location and/or regulatory status.

7.4 Per- and Polyfluoroalkyl Substances (PFAS)

As of July 8, 2024, two (2) per- and polyfluoroalkyl substances (PFAS) chemicals, namely perfluorooctanoic acid (PFOA) and perfluorooctansulfonic acid (PFOS), have been designated as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Certain industries, including fluorotelomer manufacturers, industries utilizing aqueous

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film-forming foams (AFFF; military operations, aviation facilities, bulk oil / flammable liquid facilities, etc.), wastewater treatment facilities, car washes, and agricultural industries utilizing biosolids for fertilizers, have largely been associated with PFAS contamination.

No PFAS-associated industries were identified during Trileaf's review of the current and historical uses of the Subject Property and surrounding area. While PFAS are known to be widely present in the environment, no PFAS production, significant PFAS use, or associated release(s) are suspected in association with the Subject Property or surrounding area.

7.5 Radon

Radon is an odorless, colorless, radioactive gas that occurs naturally in soil, rock and building materials. It results from the natural radioactive decay of radium. In outdoor air, radon is generally diluted to such low concentrations that it is not of concern. In enclosed spaces such as homes or offices, radon can accumulate and pose an environmental concern. Indoor levels of radon depend on a building's construction and the concentration of radon in underlying soil and rock. The EPA recommended action level for radon is 4 picocuries per liter (pCi/L). According to the EPA, Pima County, Arizona is located in Zone 2, which has a predicted average indoor radon screening ranging from 2.0 to 4.0 pCi/L. There is a medium potential that elevated indoor radon concentrations will be encountered if any enclosed spaces are constructed below grade surface; however, since there will be no occupants associated with the structures constructed for the proposed scope of work for this project, radon levels should pose no environmental concern to the Subject Property.

7.6 Wetlands and State Open Waters

According to a desktop review of the US Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) map, in addition to a USGS topographic map, the Subject Property is not mapped in a wetland, or within 300 feet of a wetland, and the topography does not imply hydrologic activity. The nearest NWI mapped wetland is the Soto Wash stream, located approximately 315 feet southwest of the proposed lease area. During Trileaf's site reconnaissance, no obligate hydrophytic vegetation was observed within the Subject Property boundaries itself. Finally, according to the Soil Survey provided in the PSSA and sourced from the U.S. Soil Conservation Service Soil Survey (see Section 3.6.2 above), the soil beneath the Subject Property does not meet hydric criteria. Therefore, Trileaf has determined that the Subject Property (including both lease area & easements) is not located in a wetland, or within 300-feet of a wetland. The Site Vicinity Map is located in Appendix 13.1, and the NWI map is included in Appendix 13.2.

7.7 Physical Settings Sources

Physical Settings Sources are discussed in Section 3.6.

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7.8 Historical Use Information on the Subject Property

The past use of the Subject Property is summarized in the following table.

Table 7.8: Historical Subject Property Use Summary		
Date(s)	**Source(s)**	**Subject Property Use(s)**
1936 - Present	Historical aerial photographs; Historical topographic maps; Historical city directories; Site reconnaissance	Scrubland

In the first available aerial photograph, dated 1936, the Subject Property was observed as scrubland, and this use has persisted to the present day. See also the Historical Research Documentation Appendix.

Review of the historical information did not identify adverse environmental conditions associated with the Subject Property.

7.9 Historical Use Information on Adjoining Properties

The past use of the adjoining properties is summarized in the following table.

Table 7.9: Historical Adjoining Property Use Summary		
Date(s)	**Source(s)**	**Property Use(s)**
Northeast		
1936 - 1966	Historical aerial photographs; Historical topographic maps	Scrubland
1974 - Present	Historical aerial photographs; Historical topographic maps; Historical city directories; Site reconnaissance	West Diamond Bell Ranch Road, followed by scrubland
Southeast		
1936 - Present	Historical aerial photographs; Historical topographic maps; Historical city directories; Site reconnaissance	Scrubland
Southwest		

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Table 7.9: Historical Adjoining Property Use Summary		
Date(s)	**Source(s)**	**Property Use(s)**
1936 - 1976	Historical aerial photographs; Historical topographic maps	Scrubland
1983 - Present	Historical aerial photographs; Historical topographic maps; Historical city directories; Site reconnaissance	Scrubland, followed by the Soto Wash, followed by rural residences
Northwest		
1936 - 1966	Historical aerial photographs; Historical topographic maps	Scrubland
1974 - Present	Historical aerial photographs; Historical topographic maps; Historical city directories; Site reconnaissance	Scrubland, followed by West Larkdale Street

In the first available aerial photograph, dated 1936, the surrounding area was observed as scrubland in all directions. Beginning in 1974, public roads began development in the northeast and northwest surrounding areas, with Diamond Bell Ranch Road being developed to the northeast, and West Larkdale Road being developed to the northwest. Following this, in 1983, multiple residences were constructed in the area to the southwest. See also the Historical Research Documentation Appendix.

Trileaf did not observe additional potentially adverse environmental conditions associated with the adjoining properties during the site walkover.

8.0 FINDINGS

The Subject Property consists of an approximately 2,500 square foot lease area, and an approximately 80-foot-long access / utility easement, and is located at 15949 W. Diamond Bell Ranch Road, Arivaca, Pima County, Arizona 85736. The proposed lease area of the Subject Property is currently scrubland, while the proposed easement is also currently scrubland. The past use of the Subject Property has consisted of scrubland, since approximately 1936.

Trileaf performed a site reconnaissance at the Subject Property on March 2, 2026. No obvious signs of environmental concerns (monitoring wells, soil staining, stressed vegetation, odors, pools of liquid, and other signs of potential environmental concerns) were noted on the Subject Property or on the adjoining sites during Trileaf's reconnaissance.

Neither the parent parcel nor the Subject Property were listed in the regulatory records.

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Trileaf did not identify RECs, CRECs, HRECs, or *de minimis* conditions associated with the Subject Property.

Furthermore, Trileaf did not identify any significant data gaps.

8.1 Vapor Encroachment

Trileaf has conducted a Vapor Encroachment Screen (VES) by evaluating historic and regulatory record sources along with soil, topographic, and groundwater data in the vicinity of the Subject Property. The purpose of the VES is to determine the likelihood that Vapor Encroachment Conditions (VECs) exist at the Subject Property. It should be noted that this VES was not conducted in full compliance with ASTM E2600-15; rather, this VES is the equivalent of a Tier 1 screening. Consideration of vapor encroachment consists of reviewing available information and use of professional judgment in determining 1) whether contamination is suspected in the soil and/or groundwater at, or near, the Subject Property, and 2) whether identified contamination is suspected to exist within a 'Critical Distance' from the Subject Property.

"Critical Distances", as defined in *ASTM E2600-15 Standard Guide for Vapor Encroachment Screening on Subject Property Involved in Real Estate Transactions,* refer to the maximum distances at which vapor encroachment may occur. These distances vary depending on topographic and hydrologic gradient, width of the contaminant plume, and type of contaminant known, or suspected, to exist. Generally, Critical Distances are 100 feet for non-petroleum contaminants of concern (COCs) and 30 feet for dissolved petroleum COCs. If a facility is beyond the critical distance, it is highly unlikely that a VEC exists. Consideration of topographic gradient is key to defining the Areas of Concern (AOCs) within which Critical Distances are applied. When plume data is not available, AOCs are used in lieu of Critical Distance to determine whether a VEC exists or not. According to ASTM E2600, the AOCs for these critical distances are as follows:

- 1,760 feet (1/3 mile) for contamination located up-gradient of the Subject Property, except for dissolved petroleum hydrocarbons, which have a distance of 528 feet (1/10 mile),
- 365 feet for contamination located cross-gradient of the Subject Property,
- 100 feet for contamination located down-gradient of the Subject Property, with the exception of dissolved petroleum hydrocarbons, which have a distance of 30 feet.If non-aqueous phase petroleum hydrocarbons (LNAPL) are present, the 100-foot distance is utilized.

Based on Trileaf's VES, this investigation has identified no potential VECs in connection with the Subject Property.

9.0 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of 15949 W. Diamond Bell Ranch Road, Arivaca, Pima County, Arizona 85736, the *Subject Property*. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report.

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In addition, Trileaf reviewed the site for environmental conditions that are beyond the scope of ASTM E1527-21, and has determined the following:

- No wetlands or state open waters were identified within 300 feet of the Subject Property.
- No lead-based paint, lead-containing paint, or asbestos-containing materials are anticipated to be disturbed as part of the proposed installation.
- No wastewater discharges, drains, ditches, streams, or wells were identified within 300 feet of the Subject Property.

This assessment has revealed no evidence of RECs in connection with the Subject Property. It is the opinion of Trileaf that no additional investigation is warranted at this time. These conclusions are based on the review of available historical information, regulatory records, site reconnaissance, and interviews.

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

10.0 OPINIONS AND RECOMMENDATIONS

This assessment has revealed no evidence of RECs in connection with the Subject Property. It is the opinion of Trileaf that no additional investigation is warranted at this time. These conclusions are based on the review of available historical information, regulatory records, site reconnaissance, and interviews.

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11.0 CERTIFICATION STATEMENT AND SIGNATURE OF ENVIRONMENTAL PROFESSIONAL

The following environmental professionals and others of Trileaf participated in the writing of this report. This Phase I ESA was performed in accordance with the generally accepted practices in the field of environmental consulting. The analysis and recommendations indicated in this report are based upon the best current available information that could be obtained in the specified time frame. Trileaf assumes no liability for independent conclusions or recommendations made by others in conjunction with the data presented in this report.

Nathaniel Fritz
Project Scientist II

I declare that, to the best of my professional knowledge and belief, I meet the definition of *Environmental professional* as defined in § 312.10 of 40 C.F.R. § 312, and I have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the *subject property*. I have developed and performed the *all appropriate inquiries* in conformance with the standards and practices set forth in 40 C.F.R. Part 312.

Emily Senne
Project Manager II
Environmental Professional

This declaration is dated March 16, 2026.

Resumes of the environmental professionals and others who participated in the preparation of this ESA are included in Qualifications of Environmental Professionals and Others (Appendix 13.11).

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

12.0 REFERENCES

ASTM E1527-21

Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process
Designation: E1527-21
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428-2959

Arizone Department of Environmental Quality - Database Search Page

https://azdeq.gov/databases

Arizona Department of Environmental Quality - Records Center

https://my.azdeq.gov/mydeq-recordscenter/records-request

Environmental Database Resources

6 Armstrong Road, 4th Floor
Shelton, CT 06484
http://edrnet.com

Google Inc. (2025)

Google Earth Pro (Version 10.83.0.1) [Software]. Available from: http://www.google.com/earth/

Pima County, Arizona - Office of Emergency Management

https://pima-oem.app.transform.civicplus.com/forms/32913

U.S. Geological Survey - Geologic Map

Richard, S.M., Reynolds, S.J., Spencer, J.E., and Pearthree, P.A., 2000, Geologic Map of Arizona: Arizona Geological Survey Map 35, 1 sheet, scale 1:1,000,000.
https://mrdata.usgs.gov/geology/state/sgmc2-unit.php?unit=AZTsy;0

U.S. Geological Survey - Topographic Maps

Stevens Mountain Quadrangle, Subject Property State – 7.5-Minute Series (2021)
https://viewer.nationalmap.gov/
basic/?basemap=b1&category=ustopo&title=US%20Topo%20Download#startUp

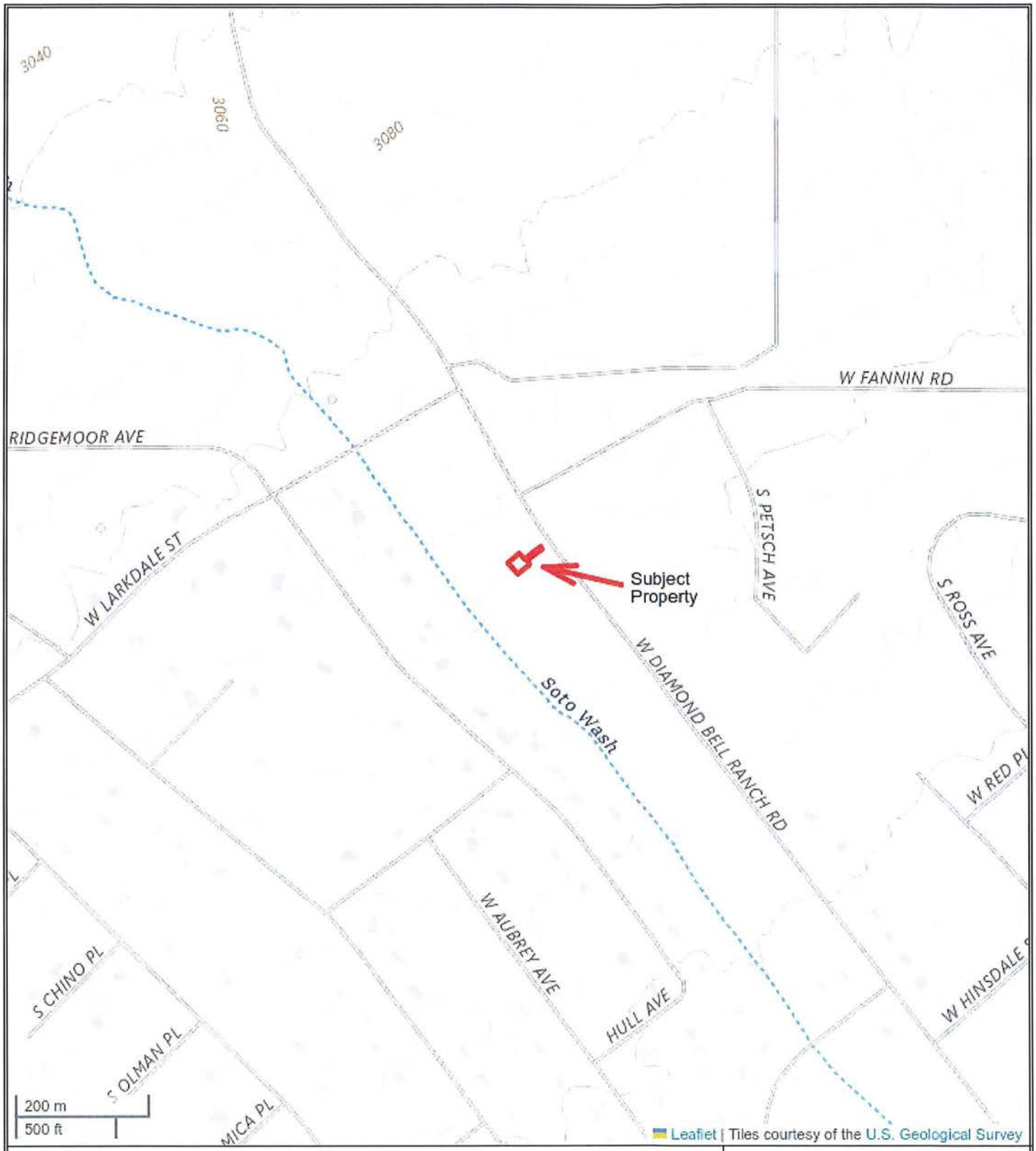
Wetlands Map - US Fish and Wildlife Service

National Wetland Inventory (NWI)
https://www.fws.gov/wetlands/Data/Mapper.html

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Appendix 13.1
Site Vicinity Map

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562



Site Vicinity Map with Quadrangle Data Information

Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736
Stevens Mountain Quadrangle, 2021
Latitude: 31.999883 North; Longitude: 111.30335 West

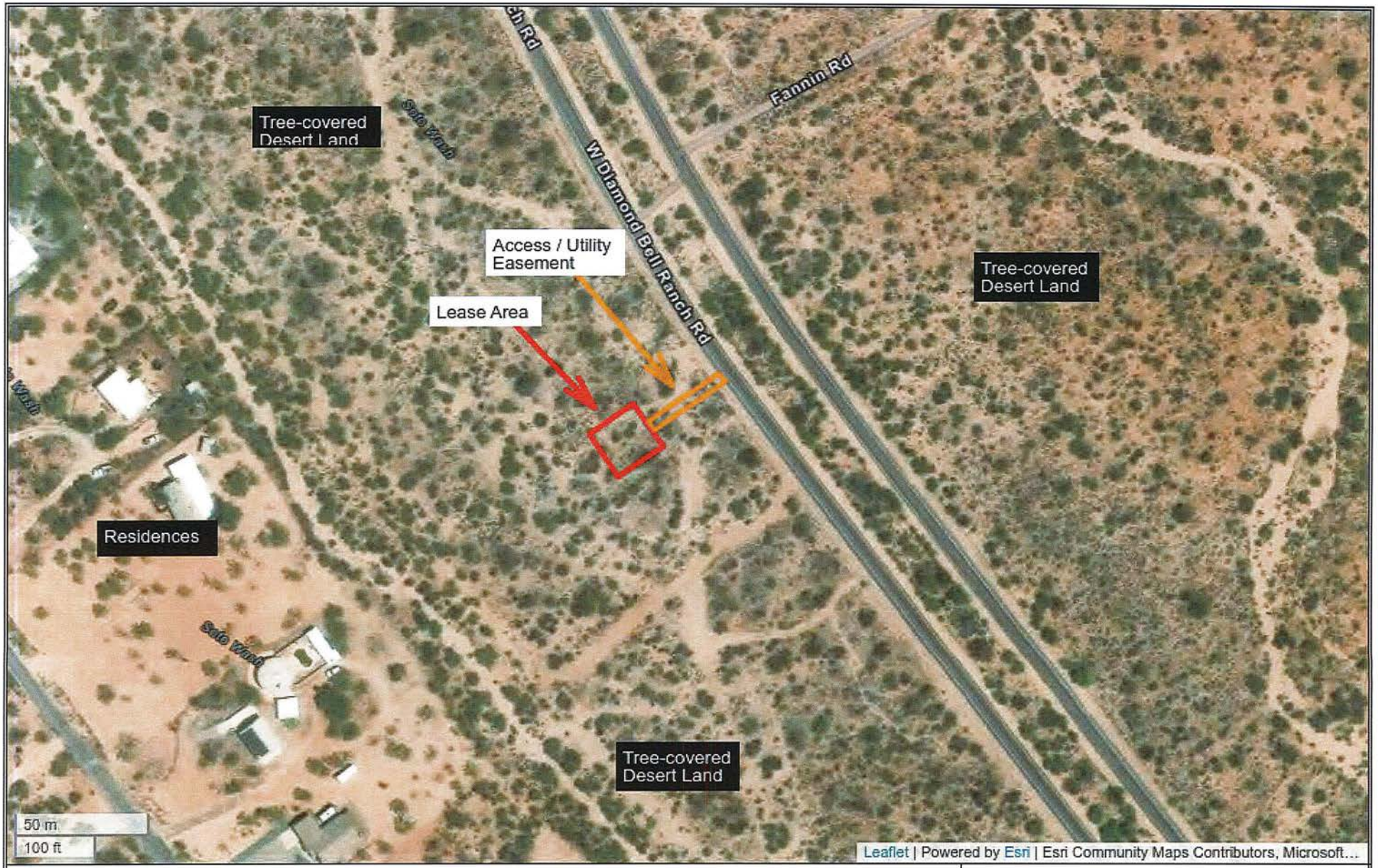
North

TRILEAF
environmental architecture engineering

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Appendix 13.2
Site Plan and Other Maps

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562



Site Plan

Diamond Bell

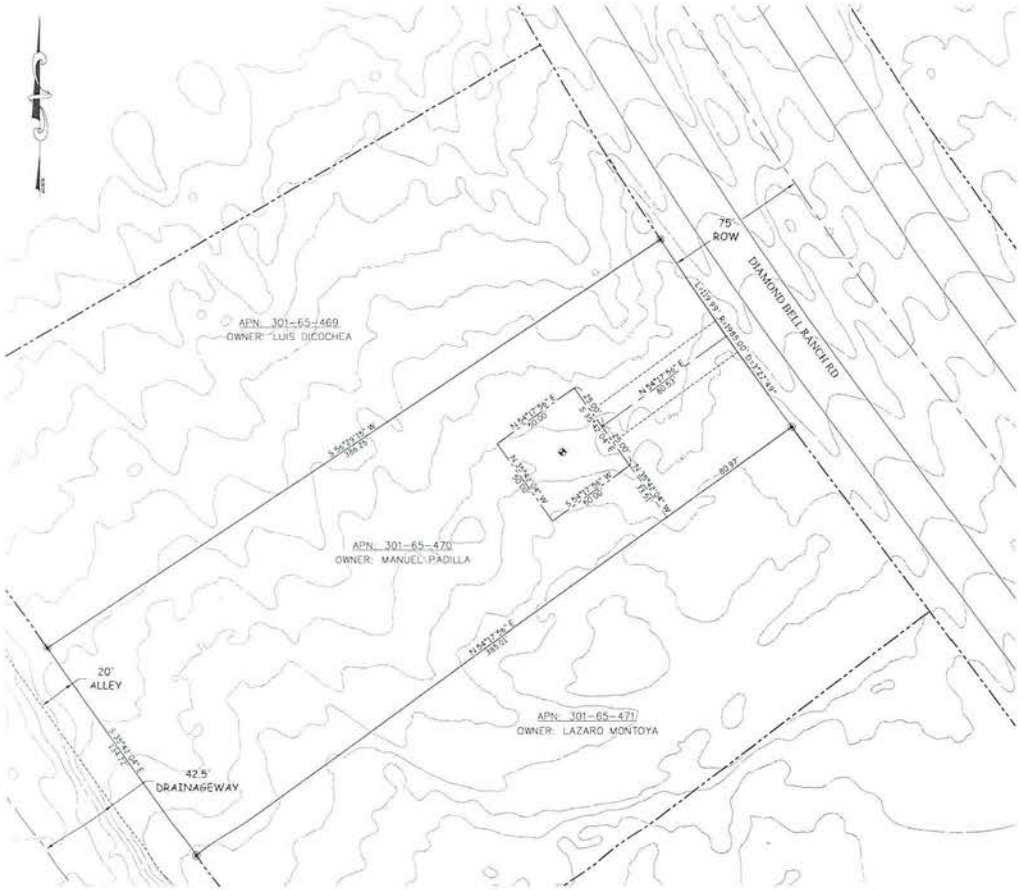
15949 W. Diamond Bell Ranch Road

Arivaca, Arizona 85736

North

TRILEAF

environmental architecture engineering



ACCESS AND UTILITY EASEMENT LEGAL DESCRIPTION

A 20 FOOT ACCESS AND UTILITY EASEMENT SITUATED IN LOT 8, OF DIAMOND BELL RANCH-TUCSON UNIT NO. 7, A SUBDIVISION OF PIMA COUNTY, ARIZONA, ACCORDING TO THE PLAT OF RECORD IN THE OFFICE OF THE PIMA COUNTY RECORDER IN BOOK 26 OF MAPS AND PLATS AT PAGE 71 THEREOF, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF SAID LOT 8, THENCE SOUTH 54°17'56" WEST, ALONG THE SOUTHEAST LINE OF SAID LOT, A DISTANCE OF 80.97 FEET;
THENCE DEPARTING SAID SOUTHEAST LINE NORTH 35°42'04" WEST, A DISTANCE OF 58.51 FEET TO THE POINT OF BEGINNING OF THE CENTERLINE OF SAID EASEMENT LYING 10.00 FEET ON EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE:

THENCE NORTH 54°17'56" EAST, A DISTANCE OF 80.53 FEET TO A POINT ON THE SOUTHWEST RIGHT OF WAY LINE OF DIAMOND RANCH ROAD AND BEING THE POINT OF TERMINUS.

PARENT PARCEL LEGAL DESCRIPTION

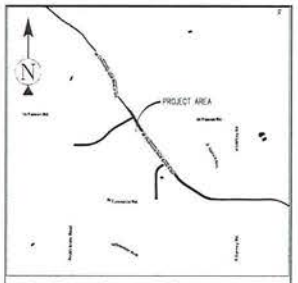
LOT 8, OF DIAMOND BELL RANCH-TUCSON UNIT NO. 7, A SUBDIVISION OF PIMA COUNTY, ARIZONA, ACCORDING TO THE PLAT OF RECORD IN THE OFFICE OF THE PIMA COUNTY RECORDER IN BOOK 26 OF MAPS AND PLATS AT PAGE 71 THEREOF.

LEASE AREA LEGAL DESCRIPTION

A PORTION OF LOT 8, OF DIAMOND BELL RANCH-TUCSON UNIT NO. 7, A SUBDIVISION OF PIMA COUNTY, ARIZONA, ACCORDING TO THE PLAT OF RECORD IN THE OFFICE OF THE PIMA COUNTY RECORDER IN BOOK 26 OF MAPS AND PLATS AT PAGE 71 THEREOF, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF SAID LOT 8, THENCE SOUTH 54°17'56" WEST, ALONG THE SOUTHEAST LINE OF SAID LOT, A DISTANCE OF 80.97 FEET;
THENCE DEPARTING SAID SOUTHEAST LINE NORTH 35°42'04" WEST, A DISTANCE OF 33.51 FEET TO THE POINT OF BEGINNING;
THENCE SOUTH 54°17'56" WEST, A DISTANCE OF 50.00 FEET;
THENCE NORTH 35°42'04" WEST, A DISTANCE OF 50.00 FEET;
THENCE NORTH 54°17'56" EAST, A DISTANCE OF 50.00 FEET;
THENCE SOUTH 35°42'04" EAST, A DISTANCE OF 50.00 FEET TO THE POINT OF BEGINNING.

LEGAL DESCRIPTIONS



VICINITY MAP – N.T.S.

BENCHMARK

ELEVATIONS WERE ESTABLISHED FROM PROCESSING GPS DATA WITH AND CONSTRAINING TO NGS "CORS" STATIONS AND APPLYING GEOID12b SEPARATIONS AND ARE AT NAVD88 DATUM.

BASIS OF BEARINGS

BEARINGS SHOWED HEREON ARE BASED UPON U.S. STATE PLANE NAD83 COORDINATE SYSTEM, ARIZONA EAST ZONE, DETERMINED BY GPS OBSERVATIONS.

SURVEY DATE

1/30/2026

SURVEYOR'S NOTES

SURVEY PREPARED FOR ROCKY MOUNTAIN TOWERS.

ALL ROUTES CONTAINED WITHIN SAID TITLE REPORT AFFECTING THE IMMEDIATE AREA SURROUNDING THE LEASE HAVE BEEN PLOTTED (EXCEPT FOR ROOFTOPS). SURVEYOR HAS NOT PERFORMED A SEARCH OF PUBLIC RECORDS TO DETERMINE ANY DEFECT IN TITLE ISSUED.

THE BOUNDARY SHOWN HEREON IS PLOTTED FROM RECORD INFORMATION AND DOES NOT CONSTITUTE A BOUNDARY SURVEY OF THE PROPERTY.

AT THE TIME OF THE SURVEY, NO ENCROACHMENTS WERE DISCOVERED THAT AFFECTED LEASE OR ROUTE AREAS.
THE LEASE AND ROUTE LIE ENTIRELY WITHIN THE PARENT PARCEL.

THE ACCESS AND UTILITY ROUTE ADJOINS TO A PUBLIC RIGHT OF WAY.

UTILITY NOTES

SURVEYOR DOES NOT GUARANTEE THAT ALL UTILITIES ARE SHOWN OR THEIR LOCATIONS. IT IS THE RESPONSIBILITY OF THE CONTRACTOR AND DEVELOPER TO CONTACT BLUE STAKE AND ANY OTHER INVOLVED AGENCIES TO LOCATE ALL UTILITIES PRIOR TO CONSTRUCTION. REMOVAL, RELOCATION AND/ OR REPLACEMENT IS THE RESPONSIBILITY OF THE CONTRACTOR.

PROJECT INFORMATION

GRAPHIC SCALE

0 5 15 30 60 120

(IN FEET)
1 INCH = 30 FT

CENTER OF PROPOSED MONOPOLE (NAD83)
LATITUDE 31° 59' 59.58" NORTH
LONGITUDE 111° 18' 12.06" WEST
ELEVATION 3139.87' (NAVD88)

1-A ACCURACY CERTIFICATION

THE HORIZONTAL ACCURACY OF THE LATITUDE AND LONGITUDE AT THE CENTER OF EACH SECTOR FALLS WITHIN FIFTEEN (15) FEET. THE ELEVATIONS (NAVD88) OF THE GROUND AND FIXTURES FALL WITHIN THREE (3) FEET.

LEGEND

POB	POINT OF BEGINNING		SPOT ELEVATION
POT	POINT OF TERMINUS		POSITION OF GEODETIC COORDINATES
PUE	PUBLIC UTILITY ROUTE		WATER CONTROL VALVE
ROW	RIGHT OF WAY		FIRE HYDRANT
DW	DRIVEWAY		POWER POLE
SW	SIDEWALK		SEWER CLEAN OUT
BCHH	BRASS CAP IN HANDHOLE		SEWER MANHOLE
BCFL	BRASS CAP FLUSH		FOUND IRON REBAR

OVERHEAD ELECTRIC — PROPERTY LINE — BARBED WIRE FENCE

FEMA FLOOD INFORMATION

MAP NUMBER	COMMUNITY NUMBER	PANEL #	SUFFIX	PANEL DATE	FIRM ZONE
04019C3400L	040073	3400	L	6/16/2011	X

REGISTERED LAND SURVEYOR CERTIFICATE NO. 28719 JEFF R. COOK ARIZONA, U.S.A.
EXPIRES: 3/31/2028

I HEREBY CERTIFY THAT THIS LAND SURVEYING DOCUMENT WAS PREPARED AND THE RELATED SURVEY WORK WAS PERFORMED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL LAND SURVEY UNDER THE LAWS OF THE STATE OF ARIZONA.

SIGNED: JEFF R. COOK AZ Reg. No. 28719 Date 2/2/26
My License renewal date is March 31, 2028

RMT

PLANS PREPARED FOR:
State 48 Development Consulting
WWW.STATE48CONSULTING.COM
14201 N. 87th STREET #156
SCOTTSDALE, AZ 85260
480-243-2417 602-821-3661

PLANS PREPARED BY:
Western Geomatics Services
2929 E Riggs Rd Suite 8-197
Chandler, AZ 85249
(480) 656-7812 office
(480) 279-5195 fax

PROJECT NUMBER	DRWN BY	CHK'D BY
RMT-113	CB	JC

REVISIONS

A	2/2/26	SUBMITTAL

REGISTERED LAND SURVEYOR CERTIFICATE NO. 28719 JEFF R. COOK 2/2/26 ARIZONA, U.S.A.
EXPIRES: 3/31/2028

SITE NAME

RMT-113
TUC_FLATHEAD

SITE ADDRESS

15949 W. DIAMOND BELL RANCH RD
ARIVACA, AZ 85736

SHEET TITLE

SITE SURVEY

SHEET NUMBER

LS-1

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U.S. Fish and Wildlife Service

National Wetlands Inventory

Diamond Bell

March 11, 2026

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

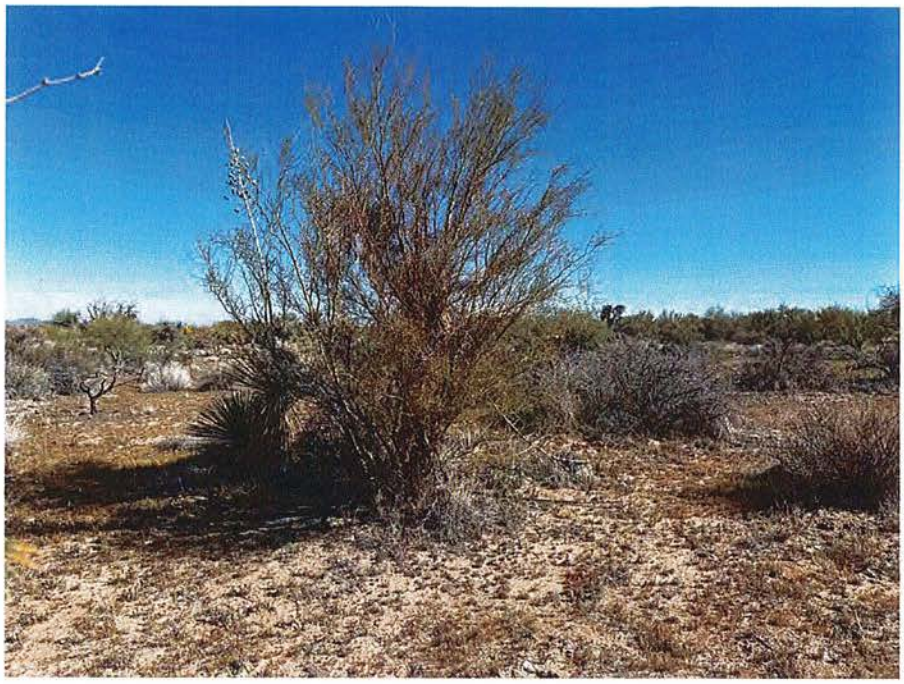
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Appendix 13.3
Site Photographs

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562



Site Photograph 1 – Looking northeast at the Subject Property

Site Photograph 2 – Looking southeast at the Subject Property

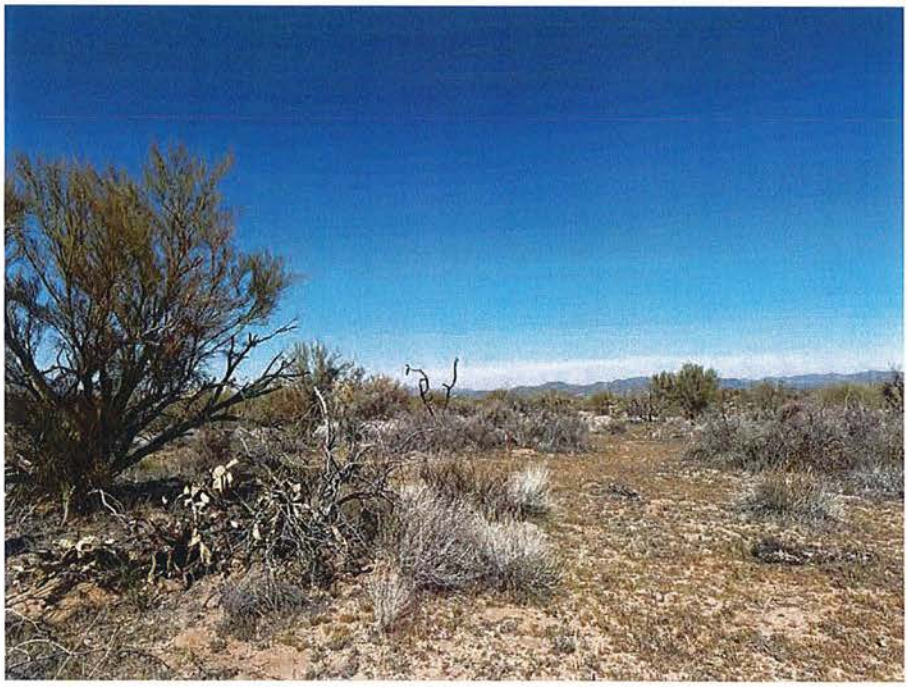
Property Photographs

Rocky Mountain Towers, Inc. – Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736

Photographed on:
March 2, 2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Site Photograph 3 – Looking southwest at the Subject Property



Site Photograph 4 – Looking northwest at the Subject Property

Property Photographs

Rocky Mountain Towers, Inc. – Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736

Photographed on:
March 2, 2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Site Photograph 5 – Looking northeast away from the Subject Property

Site Photograph 6 – Looking southeast away from the Subject Property

Property Photographs

Rocky Mountain Towers, Inc. – Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736

Photographed on:
March 2, 2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Site Photograph 7 – Looking southwest away from the Subject Property

Site Photograph 8 – Looking northwest away from the Subject Property

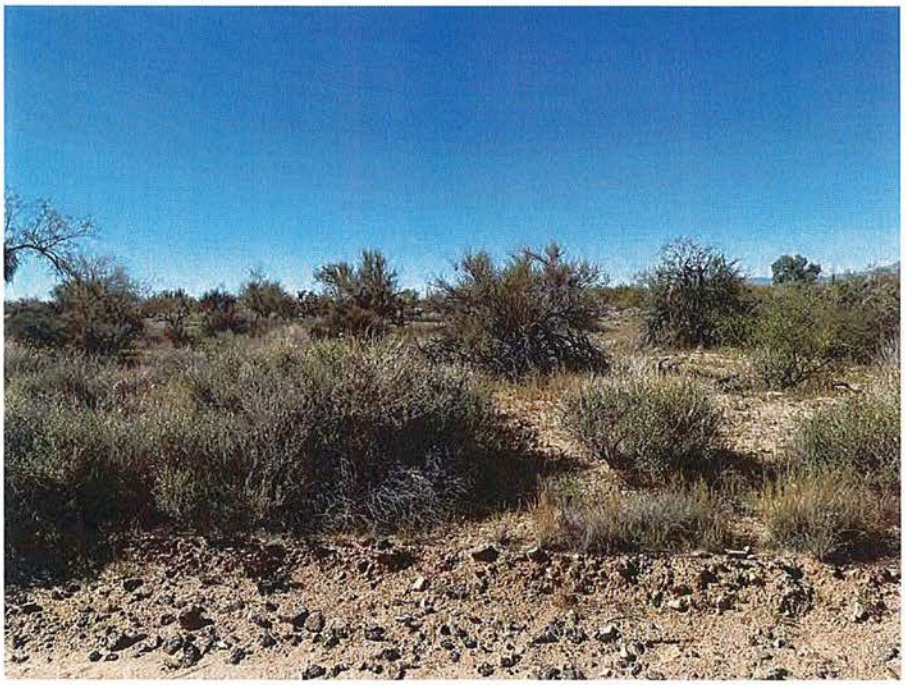
Property Photographs

Rocky Mountain Towers, Inc. – Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736

Photographed on:
March 2, 2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Site Photograph 9 – Looking northeast along the access / utility



Site Photograph 10 – Looking southwest along the access / utility easement

Property Photographs

Rocky Mountain Towers, Inc. – Diamond Bell
15949 W. Diamond Bell Ranch Road
Arivaca, Arizona 85736

Photographed on:
March 2, 2026

Docusign Envelope ID: EC416613-1C54-8B90-8079-D3CC96BB9562

Appendix 13.4
Historical Research Documentation